

Public Disclosure Commission 2009-11 Strategic Plan

May 2008

Mission Statement

The Public Disclosure Commission was created and empowered by Initiative of the People to

- provide timely and meaningful public access to accurate information about the financing of political campaigns, lobbyist expenditures, and the financial affairs of public officials and candidates, and
- ensure compliance with and equitable enforcement of Washington's disclosure and campaign finance laws.

Vision Statement

We are dedicated to building public confidence in the political process and government.

Statutory Authority

The Public Disclosure Commission is created pursuant to RCW 42.17.350. The Commission's powers and duties are set forth in RCW 42.17.360, 42.17.365, 42.17.367, 42.17.370, 42.17.395 and other provisions of chapter 42.17 RCW.

May 30, 2008

Goals and Objectives

1. Identify and implement strategies to make prevention and enforcement efforts more effective; evaluate results.

Objective: Increase compliance without enforcement action.

Strategy: Emphasize prevention over enforcement through audits and customer service.

Action Items:

- 1-1 Annually review personal financial affairs statements to gauge overall compliance rate with key reporting provisions. Report results to Commission.
Who: Assistant Director, Chief Technology Officer, Compliance Officer, Quality Assurance Manager, Compliance Staff
Timeline: Annually by March
- 1-2 Design and implement process to monitor compliance with reporting modification orders.
Who: Assistant Director, Compliance Officer, Political Finance Specialist I
Timeline: July 2009
- 1-3 Examine current enforcement rules relating to (a) brief enforcement hearings and the maximum penalty amount that may be imposed, and (b) the complaint dismissal process. Identify options for Commission consideration.
Who: General Counsel, Executive Director, Assistant Director, Senior Assistant Attorney General
Timeline: March 2010
- 1-4 Formalize the Commission's authority to hire special counsel to investigate complaints and otherwise independently pursue alleged violations of chapter 42.17 RCW.
Who: General Counsel, Executive Director
Timeline: January 2010
- 1-5 Publish summary of enforcement decisions, referrals and penalty assessments that may be sorted by various categories, including statutory citations and respondent's name.
Who: Assistant Director, Chief Technology Officer, Applications Developers
Timeline: March 2010
- 1-6 Publish common mistakes made by persons filing personal financial affairs statements, campaign finance reports and lobbying reports.
Who: Communications and Training Officer
Timeline: December 2009

- 1-7 Draft rules to define mitigating and aggravating circumstances that will impact penalty assessments.
Who: General Counsel, Senior Assistant Attorney General, Executive Director
Timeline: July 2010
- 1-8 Engage in weekly communications with campaigns during election season.
Who: Communications and Training Officer, Filer Assistants, Compliance Staff
Timeline: Ongoing during July through October
- 1-9 Create a document summarizing sections of law that have been enforced by the Commission in order to provide context on how facts of a current case compare to facts in other cases where violations were found.
Who: General Counsel, Senior Assistant Attorney General, Director of Compliance, Assistant Director, Executive Director
Timeline: June 2011; ongoing

Objective: Decrease the number of complaints alleging violations of chapter 42.17 RCW. (Government Management, Accountability and Performance Initiative)

Strategy: Focus all staff – including front office, compliance, Information technology, data entry, and filer assistance – on increasing timeliness and accuracy of reports.

Action Items:

- 1-10 Identify specific activities for each division that will help the agency realize this objective.
Who: Assistant Director, Chief Technology Officer
Timeline: July 2009; ongoing
- 1-11 Report progress to the Commission and the Governor's Office.
Who: Assistant Director, Chief Technology Officer
Timeline: Ongoing

2. Provide quick and easy public access to information; evaluate results.

Objective: Increase information available to the public.

Strategy: Improve usability of website and “get to three clicks.”*

**The concept is that web access will be quick and easy as illustrated*

by a web visitor typically using no more than three clicks to find the information he or she seeks.

Action Items:

- 2-1 Undertake a usability study of the website. Are we getting closer to “three clicks”?
Who: Chief Technology Officer, Communications and Training Officer
Timeline: March 2010
- 2-2 Create a publicly accessible searchable database of documents provided in response to public records requests.
Who: Chief Technology Officer, Administrative Officer
Timeline: June 2011 or later
- 2-3 Promote standardization of contributor and committee names so that search results are more inclusive and consistent.
Who: Chief Technology Officer, Quality Control Manager, Applications Developers
Timeline: March 2010
- 2-4 Provide electronic filing of candidate and political committee registrations.
Who: Chief Technology Officer, Quality Control Manager, Applications Developers
Timeline: March 2010
- 2-5 Develop new standard reports to assist with group enforcement activity regarding candidates, lobbyists, lobbyist employers and personal financial affairs filers.
Who: Quality Control Manager, Lead Filer Assistant
Timeline: January 2010
- 2-6 Develop an electronic filing system for public agency lobbying activity (L-5).
Who: Chief Technology Officer, Quality Control Manager, Applications Developers
Timeline: January 2011
- 2-7 Complete a plan for new electronic filing systems for private sector lobbyists (L-2) and lobbyist employers (L-3).
Who: Chief Technology Officer, Quality Control Manager, Applications Developers
Timeline: June 2011

3. Promote external communications; evaluate results.

Objective: Increase the number of informed voters.

Strategy: Teach prospective voters how to “follow the money.”

Action Items:

- 3-1 Participate in a broader array of candidate schools and association events.
Who: Communications and Training Officer, Filer Assistants
Timeline: Ongoing
- 3-2 Produce public service announcements highlighting website information.
Who: Assistant Director, Communications and Training Officer
Timeline: January 2010
- 3-3 Compose quarterly op ed articles from commissioners for submission to local media outlets.
Who: Assistant Director, Communications and Training Officer
Timeline: Ongoing
- 3-4 Produce submissions for YouTube, Myspace/Facebook, and evaluate whether to host a PDC blog.
Who: Communications and Training Officer, Assistant Director, Chief Technology Officer, Executive Director, Systems Administrator
Timeline: July 2010
- 3-5 Add glossary of terms to website.
Who: Communications and Training Officer
Timeline: September 2009
- 3-6 Promote use of electronic filing by personal financial affairs filers to increase usage of system.
Who: Communications and Training Officer, Filer Assistants, Compliance staff
Timeline: Ongoing

4. Increase Commission and staff capacity to meet organizational challenges; evaluate results.

Objective: Increase agency's ability to satisfy public expectations.

Strategy: Communicate resource needs to the Legislature.

Action Items:

- 4-1 Acquire remote disaster recovery site and obtain funding for site retention.
Who: Commission, Executive Director, Chief Technology Officer, Systems Administrator
Timeline: July 2009
- 4-2 Compare staff salaries against similar positions in state government, and request funding for upgrades if Commission determines such action is warranted.
Who: Executive Director, Assistant Director, Administrative Officer
Timeline: March 2010
- 4-3 Undertake succession planning for key staff positions.
Who: Executive Director, Assistant Director, Chief Technology Officer, General Counsel, Director of Compliance, Administrative Officer, Communications and Training Officer
Timeline: September 2010
- 4-4 Design and provide basic, intermediate, and advanced training for commissioners.
Who: Executive Director, General Counsel, Senior Assistant Attorney General
Timeline: January 2010
- 4-5 Commissioners attend compliance and ORCA training workshops.
Who: Commissioners, Filer Assistants
Timeline: Ongoing

Objective: Increase readiness to respond to changing legal environment.

Strategy: Use commissioner expertise to support laws and decisions that are workable and defensible.

Action Items:

- 4-6 Research and draft legislative proposals to address emerging case law.
Who: General Counsel, Executive Director
Timeline: December 2009
- 4-7 Obtain funding for additional services by the Office of the Attorney General.
Who: Commissioners, Executive Director, Assistant Director
Timeline: July 2011

Appraisal of External Environment

The workload of the Commission and the public's perception of how well the agency is performing are affected by a number of external factors.

1. Election cycles vary from year to year. For example, local elections are held in odd-numbered years, while state legislative races are held in even-numbered years, and races for the statewide executive offices are held every four years. Special elections for office may be held every year. Typically, there are more election campaigns in the odd-numbered years, approximately 3,000, while between 1,000 and 1,200 candidates seek office in even-numbered years. Furthermore, the number of statewide and local ballot measures before the voters varies greatly from year to year.

Although there may be more campaigns in the odd-numbered years, the contribution limits of Initiative 134 generally do not apply to candidates for local office, and thus the scope of the law that must be administered and enforced by the PDC during those election cycles is narrower than that applied to statewide executive and legislative candidates. However, in local election years, there are more first-time candidates who are frequently unfamiliar with the disclosure law's requirements.

As of 2006, however, per election contribution limits were extended to all judicial office candidates and to candidates for county and port district offices in jurisdictions with 200,000 or more registered voters; that is, in King, Pierce, Snohomish and Spokane counties and Seattle and Tacoma port districts. Clark County is expected to surpass the threshold for registered voters in the near future.

Depending on the size of the campaigns, complying with these new limits and other restrictions that accompany them (e.g., determining who shares a contribution limit with whom and not spending any general election contributions until winning the primary) is a challenge for many of these local office campaigns. Nevertheless, early indications are that candidates and their treasurers are adapting well to the new requirements, since there has not been any limits-related enforcement action involving candidates seeking these local offices in 2006 or 2007.

In addition, another 2006 session law requires candidates in small jurisdictions to file campaign disclosure reports and personal financial affairs statements if they receive or expect to receive \$5,000 or more in contributions. Prior to this change, candidates in cities, towns and special purpose districts having fewer than 5,000 registered voters have been exempt from disclosure requirements regardless of the amount of money raised and spent on their campaigns. The challenge has been to get the message out to candidates in small jurisdictions so they are not caught unaware. The assistance of county election officials has been invaluable. In 2006, no candidates filed reports consistent with this new requirement, but in 2007, 21 candidates for mayor or city council in small jurisdictions did file reports of their campaign activity, and ten of them won their elections.

2. The length of each legislative session. During the longer sessions in odd-numbered years, there are more lobbyist registrations and reports to process and monitor for

compliance. Since less than 50% of lobbyists and 20% of lobbyist employers file their reports electronically, it is difficult for the two-person data entry staff to timely enter data from the periodic reports submitted by these filers. Plus, details regarding entertainment expenses are not currently obtainable in a useful fashion from the database. In addition, at present, there is no electronic filing system for public agencies to use to file their quarterly lobbying reports. The 2009-11 Strategic Plan calls for developing an electronic filing system for public agencies, and for developing a plan that will ultimately lead to new filing systems for private sector lobbyists and lobbyist employers as well as a searchable database of lobbying expenditures.

3. The number of complaints filed by members of the public, “citizen actions” filed with the Attorney General (but investigated and, if necessary, adjudicated under chapter 34.05 RCW by PDC), and public records requests filed in connection with enforcement matters and otherwise. These are all matters over which the Commission has no control, but which, for the most part, require prompt attention.

The number of complaints filed by the public has been significantly impacted by the passage of Initiative 134. In FY 1992 (before I-134), 33 complaints were filed by the public, compared to 130 in FY 2000. During FY 2004, 98 such complaints were filed, with 62 submitted in FY 2005, 59 in FY 2006 and 41 in FY 2007. Not only has the sheer number of cases remained high, but the investigations and enforcement proceedings that follow from these complaints are longer, more complex, and often result in appeals through the judicial system.

Complainants, respondents, and others who follow the Commission’s enforcement cases have been inclined to serve the agency with public records requests that cover years or decades of documents numbering in the thousands. The inability to promptly provide access to these documents can, as was the case in July of 1998, result in penalties and attorneys fees being assessed against the Commission.

The Commission has also seen an increase in the number of “citizen’s actions” being filed. Forty-six were filed between September 1996 and December 2007, almost 12 times the total number filed during the first twenty years of the law’s existence (four). These complaints can be especially demanding on agency resources because of the strict timelines involved. RCW 42.17.400 allows any person to file a “citizen’s action” in superior court to enforce the Public Disclosure Law if that person has given the Attorney General and county prosecutor 45 days notice and the officials have declined to act. Although the statute requires notice to be filed with the Attorney General and prosecutors, the PDC, as a practical matter, is brought into these cases. The Attorney General’s office relies on the PDC to provide advice and investigate the allegations, and the PDC is billed by the AG’s office for its work on these cases.

The nine citizen action complaints filed between 2004 and 2005 severely taxed the limited resources of the PDC, often requiring two or more staff investigators, and jeopardized the agency’s ability to set its own priorities. In response, the Commission determined in February of 2006 that these complaints would be evaluated in the same manner as complaints filed directly with the PDC. Those that merit immediate action will receive it; others will be investigated in the normal course. Complainants who are dissatisfied with this approach would then have to determine whether to proceed to court. Twenty-two citizen

action complaints were filed between 2006 and 2007. None of the complainants exercised their option of going to court even though action was not always taken before the 45-day timeframe elapsed.

4. Court challenges to campaign finance laws. Notwithstanding the fact that Initiative 276 became law in 1973 and Initiative 134 was effective in 1992, PDC continues to devote considerable public resources to defending long-standing interpretations and implementation of these citizen initiatives.

In 2007, the State Supreme Court declared Washington's false advertising provision unconstitutional because it was not limited to defamatory statements (*Rickert v. PDC*). A second false advertising case was settled in light of the *Rickert* decision.

Another lawsuit related to using school district e-mail systems to support a ballot measure was filed (*Herbert/Nusbaum v. PDC*). PDC prevailed in that case when the state Court of Appeals determined that the prohibition against using public facilities to support or oppose campaigns was neither arbitrary and capricious or overbroad.

A third lawsuit originally filed in 2004 challenged the constitutionality of the definition of political committee (*Voters Education Committee v. PDC*). In 2007, the State Supreme Court affirmed the constitutionality of the definition, but the plaintiff is seeking review by the U.S. Supreme Court.

In another matter, on June 14, 2007, the U.S. Supreme Court found that the First Amendment is not violated when a state requires public sector unions to receive affirmative authorization from non-members before spending those persons' agency fees for election-related purposes (*PDC v. WEA*).

And, most recently, Human Life of Washington (HLW) filed a lawsuit in federal district court challenging the constitutionality of several campaign disclosure statutes and one agency rule (*HLW v. Brumsickle et al.*). HLW seeks a court order prohibiting the state from implementing or enforcing these statutes and rule.

The trend of persons who disagree with provisions of the campaign practices and disclosure law and seek relief in court continues.

5. Relationships with public officials. The Commission must strike a balance between maintaining an open and beneficial working relationship with the Governor, the Legislature, the Attorney General and other public officers and agencies, while fully and fairly enforcing the law that regulates candidates for those offices, incumbents holding those positions, and the lobbying activity of state and local agencies.

Of primary sensitivity is the fact that the PDC is responsible for regulating candidates for, and members of, the State Legislature notwithstanding the fact that it is the Legislature that sets the Commission's budget and has the responsibility to prescribe the Commission's authority. The PDC risks alienating legislators through the exercise of its authority since Commission action may have a direct, personal impact on members of the Legislature.

The PDC also regulates local officeholders and others within the political system who have access to state officials, such as lobbyists, PAC's, political parties, and contributors.

PDC commissioners and staff must be aware and sensitive to the political environment in which they function, but not intimidated or swayed by it.

6. Relationships with the media. As representatives of the public, the media is the Commission's "biggest customer" in seeking access to campaign information collected and disseminated by the agency. Journalists are also intensely interested in PDC investigations, enforcement hearings, and policies, since they often involve high-profile officeholders and candidates.

Because of their coverage of candidates and officials, the press becomes intimately familiar with the work of the agency, and this scrutiny tends to extend to the operations of the Commission as a whole. Sometimes it's the PDC that becomes newsworthy, not just the candidates or lobbyists it tracks.

PDC personnel must be ever mindful of the fact that the people and entities about whom the agency makes decisions are in the public eye and their reputation has a direct impact on their professional and political careers. Any mistake a staff member makes in advising or investigating persons subject to the law, or even handling their paperwork, may have significant and lasting consequences for that person's career, credibility, and future. In turn, these same mistakes may also have formidable consequences for the agency itself.

7. Relationships with filers. Since its inception, PDC has emphasized customer assistance and training as the primary means for fostering compliance with the law, believing that the vast majority of filers will comply if they know how.

In some respects, when filing meant putting pen to paper and filling in the blanks, it was easier for people not formally schooled in computers. Admittedly, for campaign treasurers, it meant manually adding up contributor aggregate totals and keeping paper records, but filing took no special technological skill or equipment, just time and commitment.

With the advent of electronic filing, a new dimension has been added. Now hundreds of filers not only need to know what the law requires of them, many of them also need help setting up their computer systems, properly entering data and generating reports. On the days immediately preceding and following filing day, to say nothing of filing day itself, PDC staff spend eight to ten hours on the telephone and responding to email messages from treasurers and accountants. Electronic filing, for all its benefits – and there are many – can add increased tension. Care must be taken in order that employees are not overtaxed, while, to the maximum extent possible, filers receive prompt and courteous assistance.

Trends in Customer Characteristics

The most significant trend is that an increasing number of filers and members of the public have access to ever-evolving technological resources and they rightfully expect PDC to utilize the latest technology to meet their needs. This trend requires the Commission to

continuously re-examine the ways in which it can best reach and serve these customers, while also recognizing that other customers are less technologically sophisticated and need considerable one-on-one assistance and very intuitive computing products to be successful.

In the 1999-2001 Supplemental Budget, the PDC was appropriated an additional \$674,000 to implement E2SSB 5931, which passed in 1999, and SB 6775, which became law in June of 2000. This legislation mandated PDC to host a Website that provided easy public access to newly filed disclosure reports and data, to offer electronic filing alternatives to filers, and to implement mandatory electronic filing for many candidates and political committees. Filing software is provided to filers at no cost.

These investments permitted the Public Disclosure Commission to meet public and legislative demands for quick access to critical information about political spending in Washington State. The public is now able to “follow the money” and do so in a technologically advanced manner. These investments have also helped filers comply with the law, improved the agency’s overall efficiency through application of modern hardware and software, and given the agency the ability to better communicate with the people it serves. Because of the wealth of information and data available on PDC’s website, and the comprehensiveness of the state’s campaign finance and disclosure law, Washington has ranked first among the states in numerous studies and surveys released during the last six years by a broad range of national organizations.

However, this dependence on technology means there is a concomitant need for funding to maintain and upgrade the agency’s hardware and software products so that they are as reliable and secure as possible. The initial funding in 2000 for information technology equipment did not include dollars for these critical and unavoidable expenses. \$142,000 was secured in the 2005-07 biennium for software maintenance and support, a key investment in the agency’s core mission.

In the 2007-09 biennial budget, PDC did receive an additional information technology developer position that is allowing the agency to make faster progress on many IT fronts: releasing a new personal financial affairs electronic filing system, revamping the website so that users can find information faster and more intuitively, and launching a gubernatorial money map that allows viewers to see how much these candidates have raised in each county.

In its 2009-11 budget request, PDC anticipates seeking ongoing funding to host redundant servers in Eastern Washington in the event of a regional natural disaster or a more localized event (e.g., building fire) that incapacitates the agency’s servers in Olympia. A redundant site would minimize the PDC’s risk of not fulfilling its statutory function while also addressing the public expectation of efficient service.

Strategy and Capacity Assessment

In June 2000, 46 persons filed their PDC reports electronically. Two years later, that number had risen to 370. By March 2006, the agency served 1,954 electronic filers. As of May 2008,

there are 3,875 electronic filers: 516 candidates, 434 political committees, 2,338 personal financial affairs filers, 390 lobbyists and 197 lobbyist employers. By the time the 2008 campaigns are in full swing, many more candidates and political committees will be filing electronically.

This continual shift to e-filing, while necessary for prompt public access to data, means that additional agency resources are being devoted to questions concerning use of electronic filing software. Part of the long-term solution lies with more sophisticated on-line help screens, tutorials and the like, but filing programs will also have to be systematically upgraded to make them as error retardant and user friendly as possible.

However, it is necessary to recognize that the landscape has changed and the demand for technological assistance from PDC staff will not abate. To better manage this demand, in 2004 the agency created a filer assistance specialist position from what had been an information technology applications specialist position. Of course, since one staff member cannot promptly respond to all callers, the five political finance specialists are expected to have a working knowledge of the filing systems used by campaigns, lobbyists, lobbyist employers and personal financial affairs filers.

In June 2006 the law imposing contribution limits on candidates for judicial office and candidates for certain county and port district offices went into effect. With passage of that law, the 2006 supplemental budget included funding for an additional PDC filer assistant to help candidates and contributors comply with their requirements.

As part of its strategic plan, the Commission has directed staff to emphasize prevention of violations through audits and customer service. Enforcement is a necessary component of any regulatory program. However, it is also time-consuming and expensive to investigate complaints and prepare for and conduct administrative hearings, if necessary. Court action only escalates the cost to taxpayers. The PDC has always put a premium on prompt and reliable customer service. But more can and must be done to prevent violations.

One of the agency's core assets, allowing it to perform its functions effectively, remains the five citizens who are appointed by the governor to lead the PDC. The commissioners are experienced, committed, impartial, and they bring diverse perspectives and skills to their oversight duties. Every year one member's term expires in December and a new member joins the board. This rotation energizes the Commission and the staff and enhances the agency's credibility.

Internal Assessment

As part of its strategic planning effort, PDC commissioners and staff reviewed the agency's strengths, weaknesses, opportunities and threats and identified the following attributes and circumstances as warranting recognition and attention during the coming biennium.

Strengths

- Customer service is exceptional.
- Excellent public access to information.
- The Commission strives to achieve consistent and fair enforcement decisions.
- Commission makeup: diverse perspectives – experienced – committed – impartial.
- Staff: reliable, thorough, effective in supporting Commission.
- AG assistance is very knowledgeable and efficient.
- Agency recruits and retains quality employees.
- The website and the ORCA and F1 e-filing programs are well-designed, user friendly and reliable.
- Agency leverages resources well – efficient.

Weaknesses

- With the closure of Common Cause's WA State office, strong stakeholder support is not present.
- General public does not know what PDC is or does.
- Depending upon when complaints are filed, enforcement matters cannot always be resolved before relevant election.
- Agency has yet to acquire an IT disaster recovery site.
- Salaries of agency mid-managers and some compliance and training staff are not comparable with similar positions in state government.
- Need to focus more on performance measures and integrate GMAP into strategic plan.
- Audit activity needs to be more proactive rather than primarily driven by complaints.
- The campaign finance and disclosure law is complex.

Opportunities

- The disclosure law can be amended to address apparent loopholes and evolving campaign practices.
- Commission members can educate service organizations and other groups on PDC mission and role.
- Legislative relationships can be enhanced.

- Local media are effective outlets for sharing information about PDC and its work in order to improve coverage of campaign finance, lobbying and personal financial affairs issues and cases.
- New and diversified staff can be acquired as current staff retire or otherwise separate from the agency.
- Technology advancements can be used to maintain and update current systems, and bring innovation to agency's service delivery.
- Results of 2008 public survey, and design and implementation of a public education marketing plan, will help raise awareness and usage of PDC reports and data.
- Examine brief enforcement hearing maximum penalty assessment as well as the complaint dismissal process.

Threats

- National and state campaign finance litigation continues.
- Current negative attitude of courts regarding campaign finance provisions other than disclosure of contributions to candidates.
- Potential appropriation reduction, especially if Washington's economy falters.
- Loss of institutional knowledge with staff retirements.
- Core mission depends on continued technology investments.
- As government leaders look to additional economies of scale and enterprise solutions, they may lose sight of the need to protect PDC's independence and customer service reputation.

Risk Management

Several risk management activities, including but not limited to those required of all state agencies by OFM and the Governor's Office [Enterprise Risk Management, Business Impact Analysis, Continuity of Operations (COOP) plans], are completed and several others are underway as of April 2008. Those completed include, for example: submitting the BIA and COOP plans, creating a risk management committee that works with in-house counsel, ensuring appropriate staff attend risk mapping and other risk management training, updating records retention procedures, providing records training to all staff, providing ethics law training to all staff, providing the safe driving video to all staff, providing safety updates during all-staff meetings, and updating emergency disaster response plans. Those in process include, for example, scheduling a "tabletop" pandemic flu exercise for 2008, continuing to implement other risk management improvements identified in the ERM Maturity Model, finalizing the next version of the internal safety plan, and others.

Performance Measures – FY 2010

Goal: Identify and implement strategies to make prevention and enforcement efforts more effective

FY 2010 Performance Measure	Target	Actual
Percentage of candidates, lobbyists, lobbyist employers and public officials who meet statutory filing deadlines.	100%	
Percentage of routine investigations completed within 90 days.	80%	
Percentage of moderately complex investigations completed within six months.	85%	
Percentage of complex investigations completed within 12 months.	75%	

Goal: Provide quick and easy public access to information

FY 2010 Performance Measure	Target	Actual
Number of paper pages scanned for Internet access	40,000	
Number of e-filed pages processed for Internet access	45,000	
Number of times the Commission's Internet site is accessed	885,000	
Average number of days from receipt of electronically filed campaign reports to posting on web site	<1	
Average number of days from receipt of paper filed campaign reports to posting on web site	<1	
Number of campaigns using electronic filing (reflects candidates and political committees)	1,350	
Number of lobbyists using electronic filing	445	
Number of lobbyist employers using electronic filing	225	
Number of officials using electronic filing for personal financial affairs reporting	2675	
Percentage of statewide executive candidates who file 1) paper reports and 2) electronically	N/A	
Percentage of legislative candidates who file 1) paper reports and 2) electronically	5% / 95%	
Percentage of local candidates who file 1) paper reports and 2) electronically	30% / 70%	
Percentage of continuing political committees who file 1) paper reports and 2) electronically	35% / 65%	
Percentage of lobbyists who file 1) paper reports and 2) electronically	50% / 50%	
Percentage of lobbyist employers who file 1) paper reports and 2) electronically	80% / 20%	

Performance Measures – FY 2011

Goal: Identify and implement strategies to make prevention and enforcement efforts more effective

FY 2011 Performance Measure	Target	Actual
Percentage of candidates, political committees, lobbyists, and public officials who meet statutory filing deadlines.	100%	
Percentage of routine investigations completed within 90 days.	85%	
Percentage of moderately complex investigations completed within six months.	90%	
Percentage of complex investigations completed within 12 months.	80%	

Goal: Provide quick and easy public access to information

FY 2011 Performance Measure	Target	Actual
Number of paper pages scanned for Internet access	35,000	
Number of e-filed pages processed for Internet access	50,000	
Number of times the Commission's Internet site is accessed	900,000	
Average number of days from receipt of electronically filed campaign reports to posting on web site	<1	
Average number of days from receipt of paper filed campaign reports to posting on web site	<1	
Number of campaigns using electronic filing (reflects candidates and political committees)	1380	
Number of lobbyists using electronic filing	445	
Number of lobbyist employers using electronic filing	225	
Number of officials using electronic filing for personal financial affairs reporting	2950	
Percentage of statewide executive candidates who file 1) paper reports and 2) electronically	2012 elec. 15% / 85%	
Percentage of legislative candidates who file 1) paper reports and 2) electronically	5% / 95%	
Percentage of local candidates who file 1) paper reports and 2) electronically	25% / 75%	
Percentage of continuing political committees who file 1) paper reports and 2) electronically	30% / 70%	
Percentage of lobbyists who file 1) paper reports and 2) electronically	50% / 50%	
Percentage of lobbyist employers who file 1) paper reports and 2) electronically	80% / 20%	