

**FEDERAL ELECTION COMMISSION**  
**FISCAL YEAR 2027**  
**DRAFT CONGRESSIONAL BUDGET JUSTIFICATION**



**April 3, 2026**

Concurrently submitted to Congress and the Office of Management and Budget

## Table of Contents

<b>Summary of FY 2027 Draft Congressional Budget Justification .....</b>	<b>3</b>
<b>Mission Statement.....</b>	<b>8</b>
<b>Section 1: Purpose and Priorities in FY 2027.....</b>	<b>9</b>
<b>1A: Commission Overview and Future Outlook.....</b>	<b>9</b>
<b>1B: FY 2027 Priorities .....</b>	<b>12</b>
<b>Section 2: Budget Overview .....</b>	<b>16</b>
<b>2A: Budget Request .....</b>	<b>16</b>
2A.1: Description of Budget Increases and Decreases at the FEC Request Level.....	18
<b>2B: Appropriations Language .....</b>	<b>19</b>
<b>2C: Recommended Legislative Changes .....</b>	<b>20</b>
<b>Section 3: FY 2027 Agency Performance Plan and FY 2025 Agency Performance Report .....</b>	<b>27</b>
<b>3A: Introduction .....</b>	<b>27</b>
3A.1 Mission Statement .....	27
<b>3B: Organizational Structure .....</b>	<b>27</b>
<b>3C: Performance Framework.....</b>	<b>30</b>
3C.1 Strategic Goal .....	30
3C.2 Plans and Progress by Strategic Objective .....	30
<b>3D: Implementation Factors .....</b>	<b>40</b>
3D.1 Major Management Priorities, Challenges and Risks .....	40
3D.2 Data Validation and Verification.....	40
<b>3E: Conclusion .....</b>	<b>41</b>
<b>Office of the Inspector General’s Fiscal Year 2027 Budget Request .....</b>	<b>42</b>
<b>OIG Summary of Outstanding FEC Audit Recommendations .....</b>	<b>43</b>

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## Summary of FY 2027 Draft Congressional Budget Justification<sup>1</sup>

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The Federal Election Commission (FEC) is an independent regulatory agency responsible for administering, enforcing, defending and interpreting the Federal Election Campaign Act of 1971 (FECA), as amended.<sup>2</sup> As the foundation of Federal campaign finance regulation, FECA reflects Congress’s efforts to prevent corruption through two principal means. First, it ensures that the public has access to information about the sources and uses of financial support for Federal candidates, political party committees and other political committees. Second, FECA imposes amount limitations and source prohibitions on contributions received by certain types of political committees. The Commission’s responsibilities also include overseeing the Federal public funding programs for Presidential campaigns.<sup>3</sup>

### Requested Funding for the FEC

For this fiscal year (FY) 2027 Congressional Budget Justification, the requested funding level for the FEC is \$87.8 million, which is a \$6.9 million increase from the FY 2026 appropriation for the FEC. The FEC recognizes the prevailing Federal budget conditions and has limited its requested increases to only those that support modernizing or replacing critical information technology infrastructure and improving its core mission areas. As shown in Table 1 below, the requested level would be an 8.6 percent increase in funding following several years of reduced or flat funding, both of which represented declines in real terms, for FEC operations.

**Table 1—Recent FEC Appropriations**

Fiscal Year	FEC Appropriation
2023	\$81,674,000
2024	\$80,857,000
2025	\$80,857,000
2026	\$80,857,000
2027	\$87,800,000 <sup>4</sup>

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1 As discussed in more detail in Section 1.A. below, the FEC currently lacks a sufficient number of Commissioners to approve a Congressional Budget Justification. The FEC’s Office of the Chief Financial Officer (OCFO) prepared this draft Congressional Budget Justification with input from Commissioners and other FEC staff and submits it to Congress at the direction of the two currently serving Commissioners.

2 Pub. L. No. 92-225, 86 Stat. 3 (1972) (codified at 52 U.S.C. §§ 30101-45).

3 The Commission’s responsibilities for the Federal public funding programs are contained in the Presidential Election Campaign Fund Act, Pub. L. No. 92-178, 85 Stat. 562 (1971) (codified at 26 U.S.C. §§ 9001- 13) and the Presidential Primary Matching Payment Account Act, Pub. L. No. 93-443, 88 Stat. 1297 (1974) (codified at 26 U.S.C. §§ 9031-42).

4 This amount is the FEC’s request for FY 2027.

Pursuant to the FEC's authority as a concurrent submission agency,<sup>5</sup> this document seeks \$13.9 million more than the \$73.9 million included in the budget proposal from the Office of Management and Budget (OMB). OMB's request level of \$73.9 million was presented to the FEC before the FY 2026 appropriation for \$80.86 million was enacted. OMB's request level for the agency would represent an 8.6 percent decline from the FY 2026 appropriation. An appropriation of \$87.8 million would ensure that the FEC continues to support and upgrade IT operations during the year.

The FEC has previously taken significant steps to reduce personnel costs. Between FY 2014 and FY 2024, the FEC's overall staffing levels were reduced by nearly 11 percent. From October 1, 2024, through December 31, 2025, staffing levels were reduced an additional 17 percent. As of January 1, 2026, the agency had 250 staff members on board, a staffing level lower than any other time at the FEC since FY 1990. At \$87.8 million for FY 2027, the agency would increase staff by 13.8 percent by onboarding the positions approved for hiring by the Office of Personnel Management (OPM) as well as projected staffing increases in the event of a restoration of a full complement of Commissioners. OPM approved strategic hiring at the FEC for FY 2026 for a number of positions, including positions essential to IT security and to implement the modernization of legacy applications at the FEC, which are efforts to leverage technology to deliver faster and more secure services to the public. Additionally, in February 2026, the President submitted two nominees to the Senate for consideration for two of the four vacancies on the Commission. Staff who would work directly with new Commissioners would also be hired in the event the Senate confirms nominees and the President appoints them to the FEC.

Limiting the FEC funding as proposed by OMB would risk the FEC's ability to meet its mission and statutory requirements. With funding at that level, the continuation of current IT services, including those used by the public on FEC.gov, would be in serious jeopardy and all three IT modernization projects planned by the agency would need to be stopped, which would incur additional costs. This includes continuing development of FECfile+, a modern, web-based version of the agency's free electronic filing software. In this request, the FEC seeks an additional \$4.6 million for IT services so that the agency may continue current IT services and fund work to modernize the agency's electronic filing software. With the requested FY 2027 funding, the agency would continue to develop and implement plans for workforce reshaping and other measures to strive to meet the agency's statutory requirements and execute the FEC's FY 2027 priorities, specifically, IT modernization. The FEC will continue to focus its efforts on attempting to fulfill the agency's statutory requirements and focus services and performance targets on core priorities.

### **Increasing Reported Campaign Finance Activity**

The focused hiring under the \$87.8 million budget scenario would come at a time of substantial increases in reported campaign finance activity. Currently, the FEC receives campaign finance reports, statements and other disclosure documents from more than 16,000 political committees and other filers. Increases in reported campaign finance activity result in increases in the FEC's workload. For example, nearly every report submitted to the FEC must be reviewed by the FEC's Reports Analysis Division (RAD) to ensure that the public record provides a full and accurate representation of reported campaign finance activity.

Table 2 below presents the Total Receipts and Disbursements Reported to the FEC by all entities that

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5 See FECA § 307(d)(1), 52 U.S.C. § 30107(d)(1).

disclosed to the FEC over the last seven completed election cycles. The amounts for reported receipts and reported disbursements tripled over the period for both Presidential and midterm cycle elections. For each election cycle, the table also includes a count of the number of transactions reported to the FEC and the number of hits on FEC.gov’s Application Programming Interface (API). The higher transaction counts increase the FEC’s workload, and the higher API hits show increasing demand on the agency and its website.

**Table 2—Total Reported Receipts, Disbursements, Transactions & API Hits**

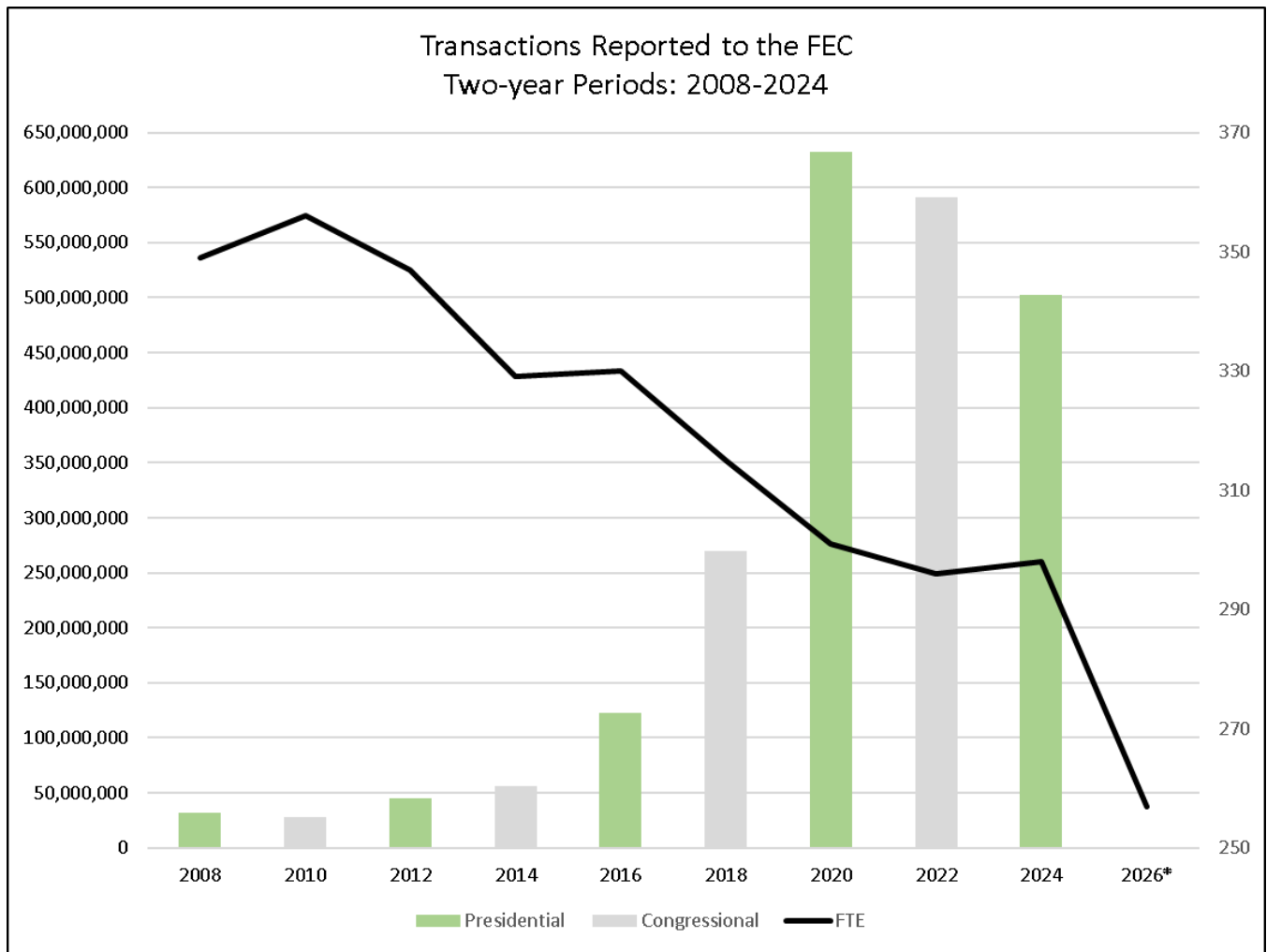
Election Cycle	Total Receipts	Total Disbursements	Transaction Count	API Hits
2012	\$8.83 billion	\$9.05 billion	45.25 million	n/a
2014	\$5.93 billion	\$5.93 billion	55.98 million	n/a
2016	\$10.92 billion	\$10.97 billion	122.14 million	36.94 million <sup>6</sup>
2018	\$10.15 billion	\$9.95 billion	269.31 million	319.26 million
2020	\$27.92 billion	\$27.18 billion	632.31 million	407.05 million
2022	\$16.70 billion	\$16.62 billion	590.90 million	479.92 million
2024	\$28.25 billion	\$27.89 billion	502.70 million	648.93 million

Changes in the way political committees raise and spend funds have also contributed to an overall increase in the number of transactions disclosed to the FEC and the volume of campaign finance data the agency continues to make accessible to the public. Campaign finance disclosure data must be received, processed and made available to the public within tight deadlines for public disclosure, and it must be safeguarded to ensure the integrity and accessibility of the information. Figure 1 below illustrates the growth of data transactions in election cycles that the FEC needs to process, store, search and display to support the FEC’s disclosure mission, and it also displays the FEC staffing levels in FTE.

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<sup>6</sup> The FEC’s API was launched during the 2016 election cycle and only included limited data and supported limited features on FEC.gov during this cycle.

**Figure 1—FTE Levels and Reported Transactions**



\* For 2026, a projected FTE is included but because the election cycle is not yet complete, a transaction count is not included.

Each transaction must be received and processed by the FEC and made available to the public on FEC.gov. This transaction-level data is also used by the FEC internally and supports much of the FEC’s mission-related work. The FEC continues to prioritize work to process these reports efficiently to ensure timely disclosure of campaign finance information that is presented accurately to the public.

The FEC provides the public access to this reported campaign finance data on FEC.gov and directly through the FEC’s API, which permits users to customize their own data searches.<sup>7</sup> Public interest in the FEC’s campaign finance data continues to grow, with the FEC’s campaign finance data API receiving 648.9 million hits during the 2024 cycle, representing a 59 percent increase over the number of API hits received during the 2020 presidential election cycle. These trends in the public’s interest in campaign finance activity illustrate both how crucial it is for the agency to continue efforts to support and secure access to this data and receive adequate funding for staff and tools to receive and process campaign finance reports, review them for accuracy and compliance and ensure the resulting data continues to be

<sup>7</sup> The FEC’s API, OpenFEC, also supports the data access available through FEC.gov.

readily available to meet the public's needs.

### **IT Modernization at the FEC**

As illustrated above, campaign finance activity and public interest in campaign finance data continue to increase, which increases the FEC's workload. To meet these demands, the FEC has prioritized efforts to streamline its operations through technological improvements and innovations to ensure its systems remain compatible with advances in technology. Funding at the requested amount for FY 2027 would provide for the additional staff and tools necessary for the agency to continue work to modernize its IT systems that in many cases are twenty to thirty years old. At the requested funding amount of \$87.8 million, the FEC would pursue projects to replace or modernize three mission-critical IT systems: the FEC's eFiling system, internal applications that facilitate RAD's review of campaign finance data, and an internal system used by the FEC's Office of General Counsel (OGC) to manage cases within OGC. With sufficient funding for these projects, the agency would also continue initiatives to incorporate artificial intelligence into agency operations, where appropriate, as part of modernization of legacy applications.<sup>8</sup> Without sufficient funding, the agency will struggle to meet statutory requirements and provide necessary transparency into the sources and amounts of funds used to support Federal elections.

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<sup>8</sup> Each of these efforts is consistent with the President's Management Agenda's instruction to agencies to leverage technology to deliver faster and more secure services. OMB Memo M-26-03, at 2 (Dec. 8, 2025).

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## Mission Statement

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**To protect the integrity of the federal campaign finance process by providing transparency and fairly enforcing and administering Federal campaign finance laws**

Congress created the FEC to administer, enforce and formulate policy with respect to FECA. The Act reflects Congress's efforts to ensure that voters are fully informed of the sources of financial support for Federal candidates, political committees and others and to prevent corruption. Public confidence in the political process depends not only on laws and regulations to ensure transparency, but also on the knowledge that those who disregard the campaign finance laws will face consequences.

The primary objectives of the FEC are: (1) to engage and inform the public about campaign finance data; (2) to promote compliance with FECA and related statutes; (3) to interpret FECA and related statutes; and (4) to foster a culture of high individual and organizational performance.

Voluntary compliance with the requirements of FECA is a particular focus of the Commission's efforts, and its educational outreach and enforcement programs are both designed to ensure compliance with the FECA's limits, prohibitions and disclosure provisions. Because of the large and rising number of political committees and the growing number of financial disclosure reports filed with the FEC, voluntary compliance is essential to enforcing the requirements of FECA. Accordingly, the Commission devotes considerable resources to encouraging voluntary compliance through widespread dissemination of educational materials related to Federal campaign finance laws to the public, the press, political committees and state election officials.

This draft Congressional Budget Justification is organized in three sections. Section 1 addresses the agency's purpose and priorities in FY 2027. Section 2 provides an overview of the agency's request. Section 3 provides an overview of the agency's four strategic objectives and describes the agency's performance goals, indicators and targets to ensure continued progress toward meeting these objectives during FY 2027.

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## Section 1: Purpose and Priorities in FY 2027

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### 1A: Commission Overview and Future Outlook

The FEC is an independent regulatory agency responsible for administering, enforcing, defending and interpreting FECA. The Commission is also responsible for administering the Federal public funding programs for Presidential campaigns.

The FEC is directed by six Commissioners, who are appointed by the President with the advice and consent of the Senate. By law, no more than three Commissioners can be members of the same political party. The Commissioners meet regularly to formulate policy and to vote on significant legal and administrative matters. FECA requires the affirmative vote of four members of the Commission to approve official actions, thus requiring bipartisan decision making.

As part of its responsibilities, the FEC is tasked with making available on FEC.gov the campaign finance disclosure reports all Federal candidates and Federal political committees must file, as required by FECA. These disclosure reports and the data contained in them are made available to the public through the Commission's internet-based public disclosure system on FEC.gov. The FEC also has exclusive responsibility for civil enforcement of FECA, including the handling of civil litigation arising from any legal actions brought by or against the Commission. Additionally, the Commission promulgates regulations implementing FECA. The Commission also has a statutory responsibility to issue advisory opinions responding to inquiries regarding interpretation and application of FECA and the Commission's regulations to specific factual situations.

The FEC began working without a quorum on May 1, 2025. FECA requires an affirmative vote of at least four Commissioners to make key decisions in many areas.<sup>9</sup> Further, on October 3, 2025, the Commission lost bipartisan representation, which prevents the Commission from performing certain administrative tasks, including acting on budget estimates or requests for concurrent submission to the President and Congress.<sup>10</sup>

As such, the FEC's Office of the Chief Financial Officer (OCFO) prepared this draft Congressional Budget Justification with input from Commissioners and other FEC staff and submits it to Congress and OMB at the direction of the two currently serving Commissioners. This draft justification is intended to provide Congress and OMB with information about the current status of the Commission.

The FEC's draft Strategic Plan for FY 2026 through FY 2030, developed pursuant to the Government Performance and Results Act of 1993 (GPRA)<sup>11</sup> and the GPRA Modernization Act of 2010,<sup>12</sup> provides

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9 Previously, the Commission lacked a quorum during January to June 2008, September 2019 to June 2020, and July to December 2020. In each of these instances, the Commission's remaining membership was bipartisan.

10 Directive 10, Section L(3)(f), [https://www.fec.gov/resources/cms-content/documents/directive\\_10.pdf](https://www.fec.gov/resources/cms-content/documents/directive_10.pdf).

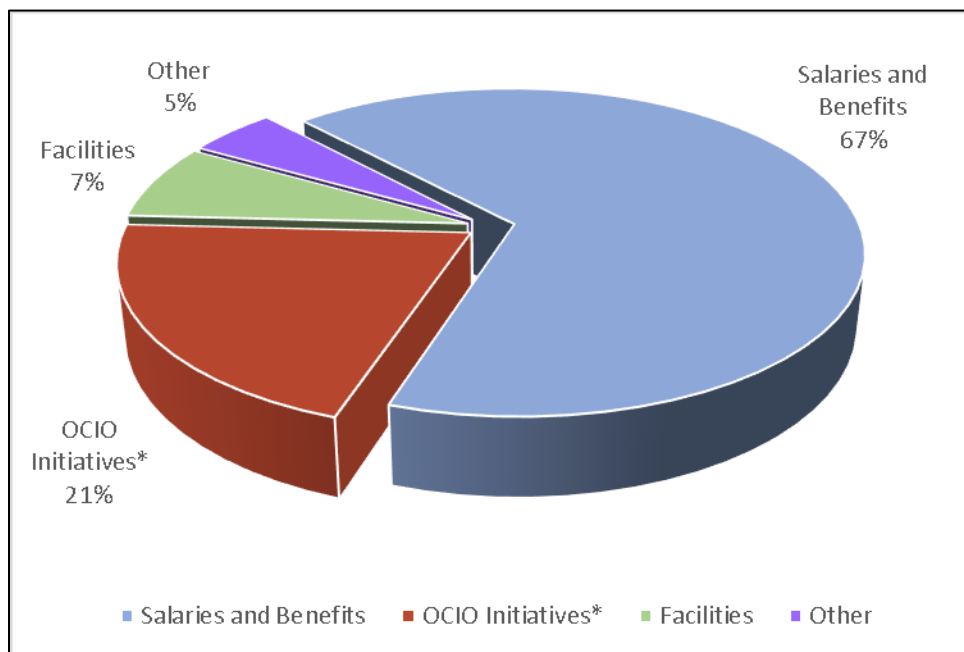
11 Pub. L. No. 103-62, 107 Stat. 285 (1993) (*codified at* 31 U.S.C. § 1115 *et seq.*).

12 Pub. L. No. 111-352, 124 Stat. 3866 (2011) (*codified at* 31 U.S.C. §§ 1115-24).

the agency’s strategic management framework.<sup>13</sup> This framework is designed to ensure that every employee works in support of the FEC’s strategic goal and objectives, and that the effectiveness of these efforts can be regularly and meaningfully measured.

The FEC is currently funded by a single annual appropriation for salaries and expenses. Nearly 70 percent of the agency’s budget is composed of salaries and benefits. Of the agency’s remaining operational expenses, the largest categories are IT operations, including IT security requirements, and facilities rent. These three requirements constituted 90 percent of the agency’s FY 2025 obligations. FY 2027 Budget obligations are shown in Figure 2 below.

**Figure 2—FY 2027 Major Categories by Budget**

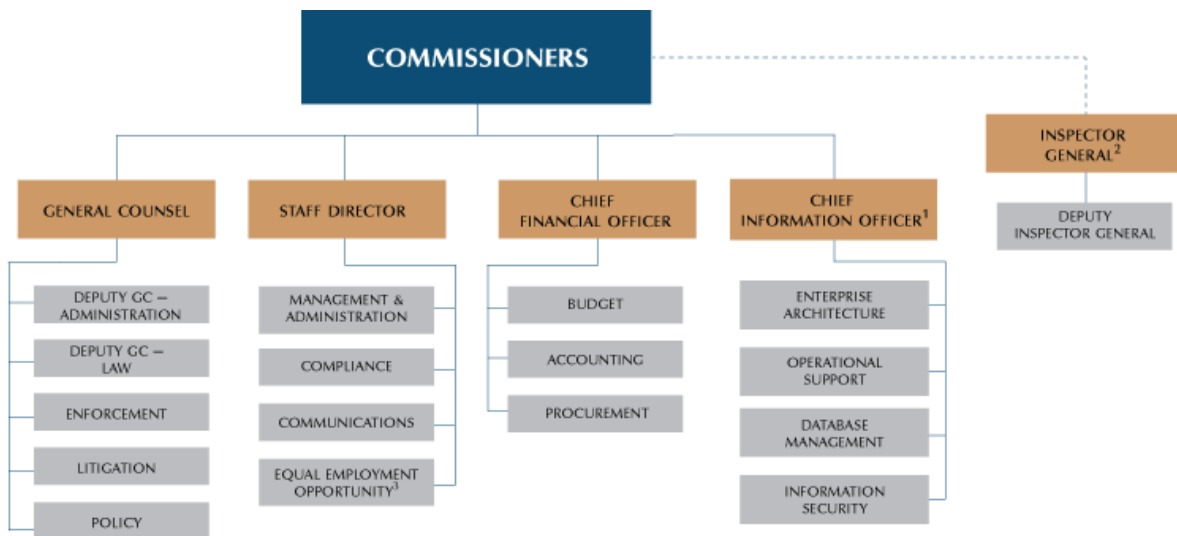


\* OCIO Initiatives includes costs for (1) maintenance of all existing applications and systems that support the FEC’s statutory duties, including the legacy eFiling program;(2) IT modernization initiatives such as modernizing the FEC’s eFiling system and applications that support RAD’s review of filing data and the replacement of the case management system used by OGC.;(3) funding of cloud hosting costs, and (4) contracts for products and services associated with maintaining the FEC’s defenses against cybersecurity threats.

## FEC Organizational Chart

The Offices of the Staff Director, General Counsel, Chief Information Officer and Chief Financial Officer support the agency in accomplishing its mission. The Office of the Inspector General, established within the FEC in 1989 under the Inspector General Act Amendments of 1988,<sup>14</sup> is independent and reports both to the Commissioners and to Congress. The specific roles and responsibilities of each office are described in greater detail at: <https://www.fec.gov/about/leadership-and-structure/fec-offices/>.

**Figure 3—FEC Organizational Chart**



- 1 The position of Chief Information Officer normally reports directly to the Staff Director who, in turn, reports to the Commission itself. At present, however, the same individual is serving in both the position of the Staff Director and the position of the Chief Information Officer, pursuant to an authorization by the Commission and based, in part, on an advance decision from the Comptroller General. Accordingly, the organizational chart reflects both positions – the Staff Director and the Chief Information Officer – as reporting directly to the Commission.
- 2 The Office of the Inspector General (OIG) independently conducts audits, evaluations, and investigations. OIG keeps the Commission and Congress informed regarding major developments associated with their work.
- 3 The Director for Equal Employment Opportunity reports to the Staff Director on administrative issues but has direct reporting authority to the Commission on all EEO matters. See 29 CFR 1614.102(b)(4).

## **1B: FY 2027 Priorities**

The FEC priorities for FY 2027 are aligned with the agency's FY 2026 to FY 2030 draft Strategic Plan and are limited to those needs that will allow the agency to fulfill its mission as required by law. As discussed below, funding at the requested amount for FY 2027 of \$87.8 million would allow the FEC to continue IT contracts and services at a level comparable to FY 2026 and continue to modernize eFiling software as well as certain legacy applications. Ensuring the agency can continue to provide operational support to agency staff will be of particular importance in FY 2027 as the agency continues to focus activities on core requirements.

### **IT Contracts and Services to Ensure the FEC Can Meet its Mission and Statutory Requirements**

The FEC protects the integrity of the Federal campaign finance process by providing transparency and fairly enforcing and administering Federal campaign finance laws. Fair enforcement and full disclosure of the sources and amounts of campaign funds allow the public to make informed decisions in the political process. Transparency requires that information is not only kept by the FEC but also that it is provided to the public in a way that is intuitive to users and provides the necessary context for understanding how Federal elections are funded. The FEC must make election-related reports and information accessible to the public in a timely, reliable and useful fashion. The Commission is therefore committed to providing the public with access to campaign finance data, compliance information and legal resources. Funding at the requested amount of \$87.8 million would allow the FEC to continue to support IT contracts and services that ensure services are delivered to the public.

Campaign finance reports disclose financial transactions that detail where political committees and other filers raised, spent, refunded, saved or transferred money. The transactions reported to the FEC might show a \$5 contribution to a candidate or a \$50,000 ad buy by a PAC. As a key means of preventing corruption, the reports containing these transactions document campaign finance activity, which serves as the record commonly used for enforcement, historical and journalistic purposes.

Once the FEC receives a report, that report is nearly immediately put on FEC.gov for the public to view as PDF documents. The transactions contained in the report are subsequently reviewed and coded by FEC staff, and only then is that coded data entered into the FEC's databases and made searchable on FEC.gov, which provides decades of transaction-level data for historical research and comparison.

Transaction-level data reported to the FEC is also used by FEC staff to ensure compliance with the FECA. Transaction-level data is reviewed by staff in the RAD through its RAD Modules system. Furthermore, other departments within the FEC rely on this data through internal systems designed to support the agency's vital compliance functions. The FEC operates in an environment where data security and integrity are paramount, and the existence of any security risks within a legacy system is a concern that demands modernization.

Funding at the \$87.8 million level would allow the FEC to maintain IT operations and continue efforts to modernize or replace outdated and inefficient legacy systems, some of which were developed in the 1990s. Crucially, at this level of funding, the FEC would continue its eFiling modernization initiative. In FY 2021, the Commission began a project to replace this outdated system with FECfile+, a modern, web-based version of the agency's free electronic filing software, which will be made available to the

filing community at no cost to aid efficient compliance with Federal campaign finance disclosure requirements. In 2024, the FEC received an \$8.8 million grant toward completion of FECfile+ from the Technology Modernization Fund (TMF)<sup>15</sup> of the U.S. General Services Administration (GSA), with an obligation to repay 50 percent of this amount. The agency plans to partially deploy the software for public use late in the second quarter of FY 2026. However, by the third quarter of FY 2027 funds from TMF will be insufficient to exercise the next option period of the project's development and operations and maintenance contract. At the \$87.8 million requested amount for FY 2027, the FEC would be able to continue this project through the end of the fiscal year. Without the requested funding amount, the agency may need to stop development of FECfile+.

Transaction-level data reported to the FEC through its eFiling system and on paper are reviewed by FEC staff in RAD through its RAD Modules system. This system is more than twenty years old and, as a result, presents a degraded performance and a greater vulnerability to security threats. Without secure and reliable access to data through the RAD Modules system, the RAD staff's ability to review reports would encounter significant obstacles. Furthermore, other departments within the FEC rely on this data through internal systems designed to support the agency's vital enforcement and compliance functions. The FEC has undertaken a multi-year initiative to modernize the RAD Modules system. Funding at the \$87.8 million level would allow the FEC to continue work to improve the efficiency and security of this mission-critical system. FY 2027 funding would also support incorporating artificial intelligence into agency operations, where appropriate as part, of modernization of legacy applications.

Funding at the requested level would also allow the FEC to replace the case management system currently used within OGC. In addition to supporting OGC's work, this system houses data that helps to ensure Commission's legal resources can be easily searched and accessed on FEC.gov. Over the past two fiscal years the agency has undertaken efforts to modernize legal search systems, including providing additional search capabilities on FEC.gov. These improvements continue to allow the agency to decommission legacy search applications, reducing IT security risks and improving efficiency. In addition, funding would allow the FEC to improve the system currently used to ensure the agency can continue to meet its obligations under the Freedom of Information Act (FOIA). Replacing the FEC's legacy internal case tracking system, which is more than 25 years old and no longer supported, and the FOIA inquiry management system will improve efficiency within the agency.

Finally, funding at the requested level will ensure the FEC can make continued progress to address the risk of potential IT security breaches. In June 2025, the FEC's OIG issued a Performance Audit Report on the FEC Security Patches and Vulnerabilities Management Programs. That report includes the auditors' determination that IT system security controls are not sufficient to reduce the risk of potential security breaches to an acceptable level. The auditors explained the cause of this situation as "partially due to the FEC's reliance on legacy systems that prevents the agency from patching known vulnerabilities in a timely manner," and "that the FEC has had significant budget and resource constraints for several years that have contributed to its inability to remediate vulnerabilities and patches related to legacy systems and outdated equipment." The Performance Audit Report identifies eight significant findings and ten recommendations to improve the FEC Security Patches and Vulnerabilities Management Programs. Funding at the FEC's requested level of \$87.8 million would permit the agency to continue to address the OIG recommendations and security vulnerabilities.

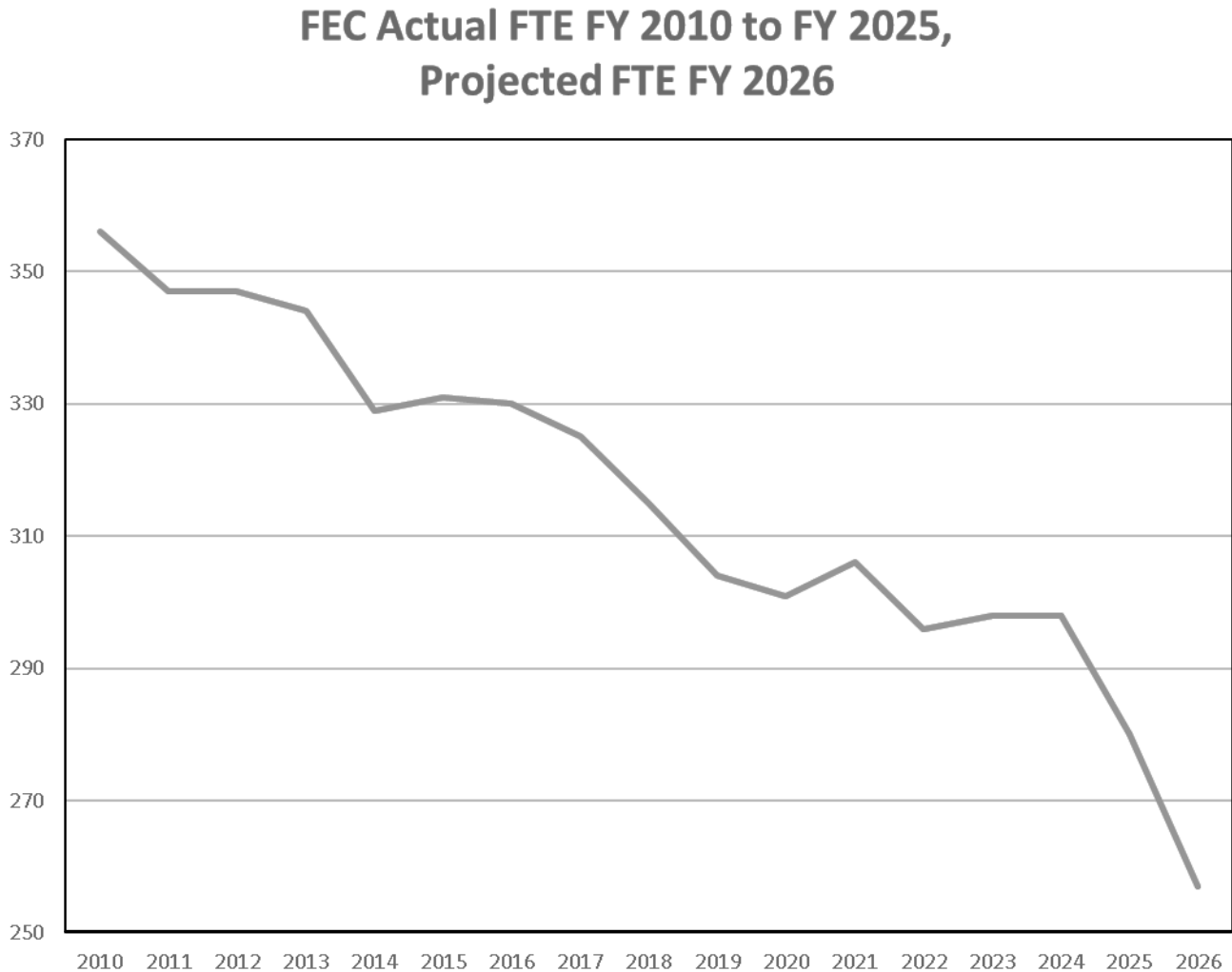
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15 TMF description and process can be found at: <https://tmf.cio.gov/about/>.

## Reshaping the Workforce to Achieve the FEC’s Mission

Funding at the \$87.8 million level in FY 2027 would support an FEC staffing level of 290 FTE. As illustrated in Figure 4 below, the FEC has experienced steadily decreasing staffing levels. From FY 2010 to present, the FEC reduced the number of employees by 23 percent through attrition while the levels of Federal campaign finance activity, and the resulting workload, increased.

**Figure 4—FTE Levels FY 2010 to FY 2026**



During this time, the FEC was able to meet its statutory mission primarily due to efficiencies gained by reassigning staff using details, maximizing operational efficiencies through reorganizations, and improving technology and processes, among other efficiencies. However, in recent years the FEC has begun to exhaust the benefits that can be gained through such efficiencies. Currently FY 2026 staffing is at the lowest level in recent history. Moreover, the FEC’s current staffing levels do not include a full complement of six commissioners and their staff or critical IT and other mission critical positions the agency plans to hire during FY 2026. Thus, with a staffing level of 290 FTE, the FEC will continue workforce reshaping efforts throughout FYs 2026 and 2027 with the goal of ensuring the agency

continues to perform its basic functions. Significant support from FEC staff is also required to continue work to develop FECFile+. The FEC will continue to focus its efforts on meeting the agency's statutory requirements and will adjust performance targets as appropriate to reflect its focus on critical projects and core practice areas. Part of the modernization of legacy applications project described above involves exploring the use of artificial intelligence in agency operations, permitting the FEC to leverage technology to achieve faster and more secure service delivery, even at a reduced staffing level.

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## Section 2: Budget Overview

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### 2A: Budget Request

Section 2A presents increases from the FY 2026 Appropriation level to the FY 2027 FEC request level. Funding at this level would support staffing to 290 FTE, align award levels to OPM guidance and fund certain high-priority IT modernization projects.

**Table 3 Changes from FY 2026 Appropriation to FY 2027 Request**

Category	Amount
<b>FY 2026 Appropriation</b>	<b>\$80,857,000</b>
<b>Personnel Changes</b>	
Personnel Compensation and Benefits	<b>\$4,300,000</b>
<b>Personnel Changes Subtotal:</b>	<b>\$4,300,000</b>
<b>Non-Personnel Changes</b>	
Travel & transportation	0
GSA Rent, Communications	50,000
Printing & Reproduction	0
Other Services	0
Training, Commercial Fed. & Tuition	0
IT Contracts	1,580,000
Contracts & Other Services	0
Federal Goods & Services	0
Supplies and Materials	0
Non-Capitalized and Capitalized Equipment	1,050,000
Insurance Claims	0
<b>Non-Personnel Changes Subtotal:</b>	<b>\$2,680,000</b>
<b>Total Change:</b>	<b>\$6,980,000</b>
<b>FY 2027 Request</b>	<b>\$87,837,000</b>

**Table 4**  
**FY 2027 FEC Congressional Budget Justification**

Object Class Data Federal Election Commission		FY 2025 Actual	FY 2026 Appropriation	FY 2027 Request	Change from FY 2026 Appropriation to FY 2027 Request	% Change from FY 2026 Appropriation to FY 2027 Request
11	Personnel Compensation	40,538,613	39,627,000	42,417,720	2,790,720	7%
11.52	Cash Awards	799,682	800,000	800,000	0	0%
12.1	Personnel benefits	15,088,716	13,923,000	15,432,280	1,509,280	11%
12.18	Transit Subsidy	135,094	250,000	250,000	0	0%
<b>Subtotal, Personnel</b>		<b>\$56,562,105</b>	<b>\$54,600,000</b>	<b>\$58,900,000</b>	<b>\$4,300,000</b>	<b>8%</b>
21	Travel & transportation	19,174	24,200	24,200	0	0%
23.1	GSA Rent, Communications	5,668,587	5,834,240	5,884,240	50,000	1%
24	Printing & Reproduction	85,589	81,850	81,850	0	0%
25	Other Services	90,469	86,145	86,145	0	0%
25.11	Training, Commercial Fed. & Tuition	345,456	761,823	761,823	0	0%
25.14	IT Contracts	10,084,025	10,835,219	12,415,219	1,580,000	15%
25.2	Contracts & Other Services	1,770,011	2,056,160	2,056,160	0	0%
25.3	Federal Goods & Services	3,043,519	2,866,836	2,866,836	0	0%
26	Supplies and Materials	419,560	511,778	511,778	0	0%
31	Non-Capitalized and Capitalized Equipment	2,232,015	3,148,749	4,198,749	1,050,000	33%
42	Insurance Claims	-	50,000	50,000	0	0%
<b>Subtotal, Non-Personnel</b>		<b>\$23,758,405</b>	<b>\$26,257,000</b>	<b>\$28,937,000</b>	<b>\$2,680,000</b>	<b>10%</b>
<b>TOTAL</b>		<b>\$80,320,510</b>	<b>\$80,857,000</b>	<b>\$87,837,000</b>	<b>\$6,980,000</b>	<b>9%</b>

**2A.1: Description of Budget Increases and Decreases at the FEC Request Level**

**Program Increase .....\$4,300,000**

**Personnel Increase .....\$4,300,000**

The FEC Request of \$87.8 million will target hiring to a staffing level of 290 FTE, which will support fully annualized personnel costs. OPM approved strategic hiring for essential positions and the possible addition of new Commissioners and related staff will increase the FEC’s staffing level. While a pay raise is not projected, awards are funded at levels to support recent OPM guidance to promote strong and incentivized performance.

**Non-Personnel Increases .....\$2,680,000**

**IT Contracts.....\$1,580,000**

Under the request, the agency will be able to sustain its operations, while simultaneously pursuing certain critical modernization projects. Funding will support the ongoing FECFile+ project and work to modernize the RAD Modules system as well as the replacement of case management tool and FOIA inquiry management tool used by OGC. Resources are also allocated towards additional licenses to support the volume of campaign finance transactions reported to the FEC and to targeted innovation initiatives, including adoption of artificial intelligence. Importantly, the agency was able to partially offset increases for modernization initiatives by completing FY 2026 network infrastructure investments, including closing its remaining data center and eliminating associated costs, and by advancing efforts to modernize legacy applications.

**Non-Capitalized and Capitalized Equipment .....\$1,050,000**

This requested increase would provide support primarily for modernization of legacy applications and internal tools including tools used to ensure the FEC meets its obligations under FOIA and to manage the enforcement case load.

**GSA Rent, Communications .....\$50,000**

This level would provide support for scheduled increases in GSA rental contracts.

## **2B: Appropriations Language**

The FEC proposes the following Appropriations Language for FY 2027.

FEDERAL ELECTION COMMISSION  
Salaries and Expenses

*For necessary expenses to carry out the provisions of the Federal Election Campaign Act of 1971, \$87,837,000, of which not to exceed \$5,000 shall be available for reception and representation expenses.*

## 2C: Recommended Legislative Changes

On December 12, 2024, the Commission approved the 2024 Legislative Recommendations.<sup>16</sup> Four of these recommendations represent bold proposals to streamline agency processes, including those for disclosing campaign finance data to the public, and ensure that the agency can operate more effectively and at a lower cost to taxpayers.

These initiatives require statutory changes to be enacted through legislation and proposed statutory language for each was approved by the Commission and provided to the Congress.

### Establish an Itemization Threshold for Conduit Contributions

*Section:* FECA § 315(a)(8)  
(codified at 52 U.S.C. § 30116(a)(8))

*Recommendation:* Congress should amend FECA’s reporting requirement for conduit contributions to establish an itemization threshold consistent with other FECA reporting requirements.

*Explanation:* Under current law, political committees must report all contributions received but are required to itemize only contributions that have an aggregate amount or value in excess of \$200 within the calendar year (or election cycle, in the case of an authorized committee of a candidate for Federal office).<sup>17</sup> Contributions of less than this amount may be reported as one aggregated transaction of “unitemized contributions,” rather than reporting each contribution separately.

With respect to contributions made by a person that are “in any way earmarked or otherwise directed through an intermediary or conduit,” FECA imposes a reporting requirement on the intermediary or conduit that requires reporting to the FEC both the receipt of the initial contribution as well as the disbursement to the intended recipient.<sup>18</sup> However, this reporting requirement does not include a threshold for itemization of contributions.

Some contributors who use conduits or intermediaries divide contributions among many intended recipients, which can make some transactions of less than one dollar. Separately reporting transactions of this size can lead to enormous reports with thousands of transactions to disclose a relatively low level of financial activity. This has a significant impact on the total number of reported transactions disclosed by all FEC filers. From 2016 to 2020, the FEC saw the number of reported transactions increase by more than 400 percent. The FEC attributes more than eighty percent of this increase to conduit and intermediary reports, as illustrated in the table below.

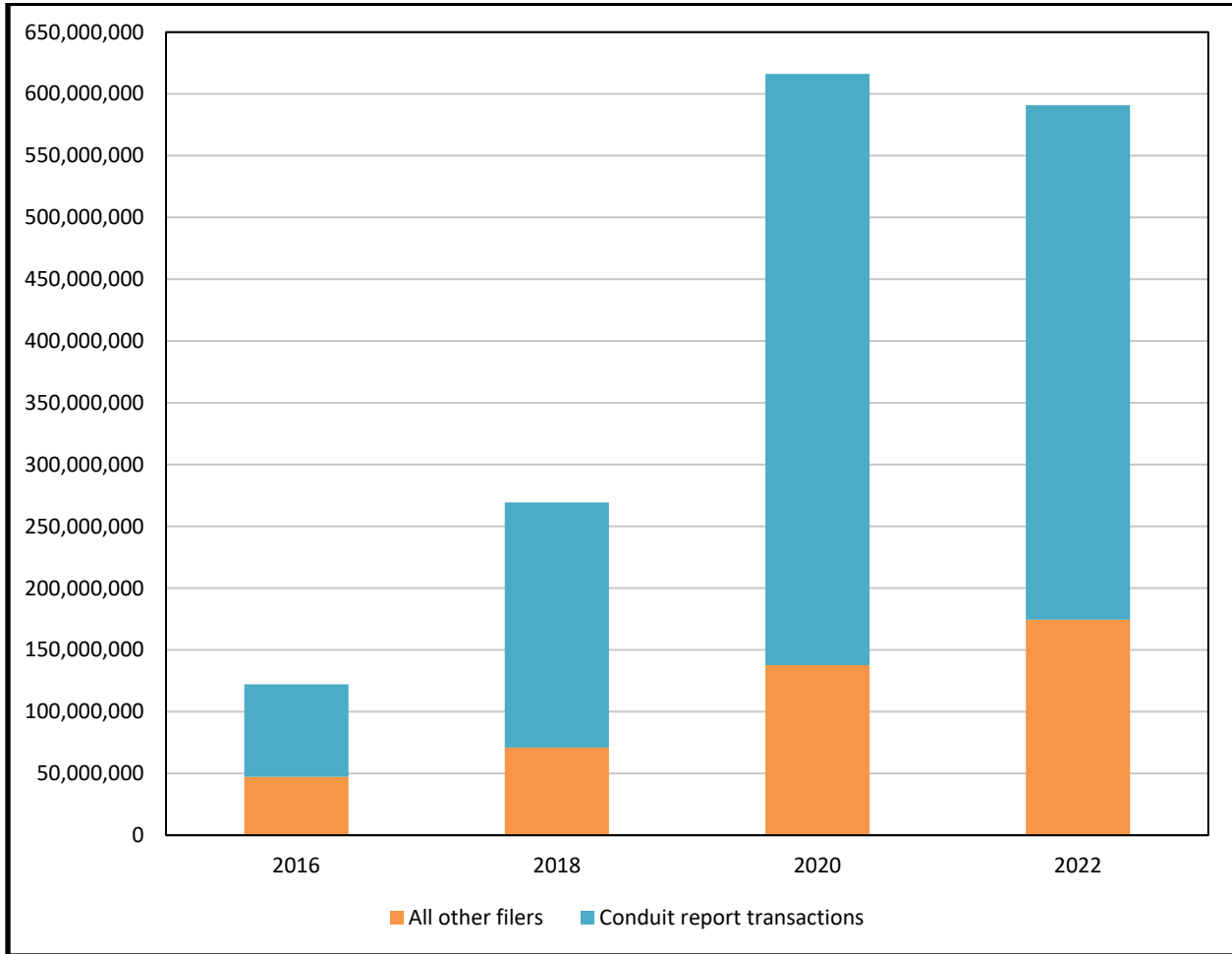
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<sup>16</sup> The Commission’s 2024 Legislative Recommendations are available at: <https://www.fec.gov/resources/cms-content/documents/legrec2024.pdf>.

<sup>17</sup> FECA, § 304(b)(3)(A), codified at 52 U.S.C. § 30104(b)(3)(A). FECA also permits committees to choose a lower threshold for reporting contributions received.

<sup>18</sup> FECA, § 315(a)(8), codified at 52 U.S.C. § 30116(a)(8).

**Transactions Reported to the FEC  
2016-2022 Election Cycles**



Congress should amend the intermediary or conduit reporting requirement to include a mandatory itemization threshold for conduits and intermediaries’ reports to the Commission. Note that conduits and intermediaries would still need to report all transactions to recipient committees to facilitate the recipient committees meeting their reporting obligations.

**Increase the Rate of Pay for FEC Commissioners, Staff Director and General Counsel**

*Section:* FECA § 306(a)(4) and (f)(1)  
(codified at 52 U.S.C. § 30106(a)(4) & (f)(1))

*Recommendation:* Congress should revise section 306 of FECA to increase the rate of pay for Commissioners and to delink the salaries of the Staff Director and the General Counsel from Level IV and Level V of the Executive Schedule.

*Explanation:*

- Commissioners

FECA provides in section 306(a)(4) that FEC Commissioners are to be paid at Level IV of the Executive Schedule. For 2024, that amount is \$191,900. However, for FEC Commissioners and others, compensation has been subject to a freeze since 2010, with only one adjustment in 2019, which limits the pay for these positions to \$158,500—a 17.4 percent reduction from the current Executive Schedule level. At this current rate, Commissioners receive less compensation than FEC employees in Senior Level positions, less compensation than all agency employees in GS-15 positions, including many of their direct reports. The FEC’s OIG expects that the percentage of FEC staff who earn more than FEC Commissioners will approach 46 percent by the end of FY 2026.<sup>19</sup>

The OIG identified the pay freeze of the Commissioners’ salary structure as a Human Capital Management challenge for the FEC in 2023, 2024, 2025 and in written testimony and responses to questions for the record submitted in connection with the Committee on House Administration’s September 2023 oversight hearing of the FEC.<sup>20</sup> Finding suitable nominees willing to serve as Members of the FEC will be increasingly difficult the longer the current situation persists. Lapses in having a quorum of Commissioners serving prevent the agency from accomplishing many of its most important functions. An increase in Commissioner compensation may reduce the likelihood of further lapses of a quorum of Commissioners.

The Commission recommends that Congress set the compensation level for FEC Commissioners at Executive Schedule Level II. For 2024, that amount is \$183,100. Changing the salaries for Commissioners would not require an increase in the Commission’s appropriation request.

- Staff Director and General Counsel

The current provision in FECA specifies that the Staff Director and General Counsel are to be paid at Level IV and Level V of the Executive Schedule, respectively. Both positions supervise personnel at the GS-15 and Senior Level pay scales, which often provide higher salaries than Levels IV and V of the Executive Schedule. The Staff Director and General Counsel have significant responsibilities and oversight duties with respect to both administrative and legal areas, as well as management over almost all agency personnel. According to recruiting specialists who have worked with the Commission, the current limit makes attracting a strong pool of applicants to these positions more challenging. The appointment and retention of these key leaders have been identified as ongoing management and performance challenges to the Commission by the Inspector General in the 10 most recent Agency

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19 FEC, Office of the Inspector General, Management and Performance Challenges Facing the FEC for FY 2025 at 15 (Nov. 13, 2024) (“OIG Challenges 2025”) <https://www.fec.gov/resources/cms-content/documents/FY-2025-Mgmt-Challenges.pdf>.

20 FEC, Office of the Inspector General, Management and Performance Challenges Facing the FEC for FY 2023 at 6 (Nov. 14, 2022), <https://www.fec.gov/resources/cms-content/documents/FY-2023-Mgmt-Challenges.pdf>; FEC, Office of the Inspector General, Management and Performance Challenges Facing the FEC for FY 2024 at 7 (Nov. 1, 2023) (“OIG Challenges 2024”); OIG Challenges 2025 at 15-16; FEC, Office of the Inspector General, Statement Before the Committee on House Administration 6 (Sept. 20, 2023) (“OIG Written Testimony”), <https://docs.house.gov/meetings/HA/HA00/20230920/116301/HHRG-118-HA00-Wstate-SkinnerC-20230920.pdf>; Letter from Christopher Skinner, FEC Inspector General, to Rep. Bryan Steil, Chair, Committee on House Administration, at 11-12 (Oct. 30, 2023) (“OIG QFRs”), <https://docs.house.gov/meetings/HA/HA00/20230920/116301/HHRG-118-HA00-20230920-QFR008.pdf>.

Financial Reports covering 2014 through 2023 and in previous Performance and Accountability Reports as well as in the Inspector General’s management and performance challenges for FY 2024 and written testimony and responses to questions for the record submitted to the Committee on House Administration.<sup>21</sup> The General Counsel’s position is currently filled on an acting basis.

The Commission proposes removing the statutory references to the Executive Schedule and amending FECA to specify that the Staff Director and General Counsel would be compensated under the same schedule as the Commission’s other senior managers. This revision will remedy the current situation where the Commission’s top managers are compensated at a lower rate than many of their direct reports and will ensure that the Commission can retain highly qualified individuals to serve in those positions as well as enable it to remain competitive in the marketplace for Federal executives when vacancies arise. Changing the salaries for these two positions would not require an increase in the Commission’s appropriation request.

### **Expand Electronic Filing Requirements**

*Section:* FECA § 304(a)(11)(A)(i)  
(codified at 52 U.S.C. § 30104(a)(11)(A)(i))

*Recommendation:* Congress should expand the types of campaign finance reports required to be filed electronically, rather than on paper, to include electioneering communication reports, inaugural committee reports and reports of communication costs.

*Explanation:* The Treasury and General Government Appropriations Act, 2000,<sup>22</sup> required the Commission to make electronic filing mandatory for political committees and other persons required to file with the Commission who, in a calendar year, have, or have reason to expect to have, total contributions or total expenditures exceeding a threshold amount set by the Commission (which is currently \$50,000). In addition, many independent expenditure reports are already subject to mandatory electronic filing under FECA section 304(a)(11)(A)(i). However, because not all funds required to be reported to the FEC meet the statutory definitions of “contributions” or “expenditures,” the current mandatory electronic filing provision does not apply to Reports of Communication Costs by Corporations and Membership Organizations (FEC Form 7), Notices of Disbursements/Obligations for Electioneering Communications (FEC Form 9), and Reports of Donations Accepted for Inaugural Committees (FEC Form 13).

Compared to data from paper reports, data from electronically filed reports is received, processed and disseminated more easily and efficiently, resulting in better use of agency resources. Reports that are filed electronically are normally available to the public, and may be downloaded, within minutes of receipt by the FEC. In contrast, the time between the receipt of a report filed through the paper filing system and its initial appearance on FEC.gov is 48 hours.

Electronic filings are not subject to delay due to post office processing or disruptions in the delivery of

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<sup>21</sup> See, e.g., OIG Challenges 2024 at 7-8; OIG Challenges 2025 at 15-16; OIG Written Testimony at 6-7; OIG QFRs at 9-10, 12.

<sup>22</sup> Pub. L. No. 106-58, § 639, 113 Stat. 430, 476 (1999).

mail, such as those arising from security measures related to the discovery of anthrax powder and ricin in mail. Because of these measures, the Commission's receipt of mailed paper filings is delayed.

Only entities that report more than \$50,000 of communication costs on FEC Form 7, electioneering communication disbursements on FEC Form 9, or donations for inaugural committees on FEC Form 13 in a calendar year would be subject to mandatory electronic filing under the proposal. The current threshold selected by the Commission ensures that entities with limited financial resources may continue to file reports on paper, which avoids the cost of internet access and a computer sufficient to file reports.

### **Increase and Index for Inflation Limitations, Thresholds and Exemptions**

*Sections:* FECA §§ 301, 304 and 315  
(codified at 52 U.S.C. §§ 30101, 30104 & 30116)

*Recommendation:* Congress should increase and index for inflation certain limitations, thresholds and exemptions in FECA, many of which have not changed since the 1970s.

*Explanation:* Most of FECA's contribution limits and registration and reporting thresholds were set in the 1970s. Because more than twenty years of inflation had effectively reduced FECA's contribution limits in real dollars, the Bipartisan Campaign Reform Act of 2002 (BCRA) increased most of FECA's contribution limits to adjust for some of the effects of inflation. Furthermore, BCRA indexed these limits for inflation to address the impact of future inflation.<sup>23</sup> The Commission proposes extending this approach to registration and reporting thresholds, which have been effectively reduced by inflation since those thresholds were established in 1971 or 1979.

Since 1971, FECA has provided that any group of persons that receives contributions or makes expenditures in excess of \$1,000 in a calendar year must register and report as a political committee.<sup>24</sup> FECA also requires political committees to abide by the contribution limits and source prohibitions specified in FECA. Since 1979, FECA has provided that local political party organizations are also subject to a \$1,000 threshold for Federal political committee status.<sup>25</sup> The Commission recommends that Congress increase these thresholds to \$2,000 and then index those amounts for inflation to prevent erosion in the future. Raising this threshold would be particularly beneficial for local and Congressional district committees of political parties. These organizations frequently breach the \$1,000 threshold. An increased threshold would permit limited spending on Federal elections without triggering Federal political committee status for local and Congressional district committees of political parties.

Since 1979, FECA has required persons (other than political committees) who make independent expenditures in excess of \$250 in a calendar year to report such expenditures to the Commission.<sup>26</sup> The

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23 Bipartisan Campaign Reform Act of 2002, § 307, Pub. L. No. 107-155, 116 Stat. 81, 102-03 (2002).

24 FECA § 301(4)(A), codified at 52 U.S.C. § 30101(4)(A); see Federal Election Campaign Act of 1971, § 301(d), Pub. L. No. 92-225, 86 Stat. 3, 11 (1972).

25 FECA § 301(4)(C), codified at 52 U.S.C. § 30101(4)(C); see Federal Election Campaign Act Amendments of 1979 (1979 Amendments), Pub. L. No. 96-187, § 101, 93 Stat. 1339, 1340 (1980).

26 FECA § 304(c)(1), codified at 52 U.S.C. § 30104(c)(1); see 1979 Amendments, § 104, 93 Stat. at 1354.

Commission recommends that Congress increase this threshold to \$500 and index this amount for inflation.

Under FECA, an individual may spend up to \$1,000 per candidate, per election and up to \$2,000 per calendar year on behalf of all political committees of the same party for food, beverages, and invitations for an event held in the individual's home without making a contribution.<sup>27</sup> FECA also permits an individual to spend up to \$1,000 per candidate, per election and up to \$2,000 per calendar year on behalf of all political committees of the same party for unreimbursed travel expenses on behalf of the campaign or political party without making a contribution.<sup>28</sup>

Congress added the current exemption limits in 1979, setting the amount for candidates as the same as the contribution limit then in effect (\$1,000 per election) and setting the amount for political parties as 40 percent of the contribution limit then in effect for state, district, and local parties (\$5,000 per calendar year) and 10 percent of the contribution limit then in effect for national parties (\$20,000).<sup>29</sup>

The Commission recommends that Congress update the in-home event exemption and unreimbursed travel expense exemption on behalf of candidates from \$1,000 to \$2,000 and index these amounts for inflation. The Commission further recommends that Congress update the in-home event exemption and unreimbursed travel exemption on behalf of political parties to \$4,000.

The 1979 FECA Amendments amended FECA to provide that authorized committees could support only one candidate, with "support" defined to exclude contributions of \$1,000 or less to an authorized committee; thus, a candidate's authorized committees contributions to the authorized committee of another candidate were limited to \$1,000.<sup>30</sup> BCRA did not amend this provision of FECA. However, in a 2004 appropriations act, Congress amended this provision of FECA to change the amount to \$2,000.<sup>31</sup> This amount, however, was not made subject to adjustment for inflation. Congress should amend FECA to make this \$2,000 limit on authorized committees' contributions to other authorized committees subject to adjustment for future inflation.

The 1976 FECA Amendments added contribution limits for multicandidate political committees and a \$5,000 limit on contributions from all persons other than multicandidate political committees to most political committees.<sup>32</sup> The amounts have not been adjusted since 1976, nor are they subject to inflation adjustment. In 2002, BCRA added a \$10,000 contribution limit applicable to contributions from all persons to political committees of state political parties.<sup>33</sup> This contribution limit is not subject to adjustment for inflation. Congress should amend FECA to make these contribution limits subject to

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27 FECA § 301(8)(B)(ii), codified at 52 U.S.C. § 30101(8)(B)(ii).

28 FECA § 301(8)(B)(iv), codified at 52 U.S.C. § 30101(8)(B)(iv).

29 See 1979 Amendments, § 101, 93 Stat. at 1340-41.

30 See 1979 Amendments, § 102, 93 Stat. at 1346.

31 Consolidated Appropriations Act, 2005, Div. H., § 525, Pub. L. No. 108-447, 118 Stat. 2809, 3271 (Dec. 8, 2004).

32 FECA Amendments of 1976, § 112(2), Pub. Law No. 94-283, 90 Stat. 475, 487 (May 11, 1976).

33 Bipartisan Campaign Reform Act of 2002, § 102, Pub. Law No. 107-155, 116 Stat. 81, 87 (Mar. 27, 2002).

inflation adjustments.

Increasing these thresholds and exemptions would take into account many years of inflation and would ease the compliance burdens on individuals and smaller organizations. Additionally, by increasing the thresholds, Congress would exempt some individuals and small organizations that engage in only minimal spending from FECA's registration and reporting requirements. Increasing the registration and reporting thresholds to compensate for inflation would leave significant financial activity subject to regulation as intended by Congress when it enacted the FECA.

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## **Section 3: FY 2027 Agency Performance Plan and FY 2025 Agency Performance Report**

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### **3A: Introduction**

This Agency Performance Plan and Report (APP/APR) is considered the companion to the Federal Election Commission’s draft Strategic Plan for Fiscal Years 2026-2030, and designed to provide a solid framework for performance planning and reporting in accordance with the requirements of the GPRA Modernization Act of 2010.<sup>34</sup> The FY 2027 Agency Performance Plan and FY 2025 Agency Performance Report are combined in this document to present accomplishments through FY 2025 and performance targets associated with FYs 2025, 2026 and 2027.

This plan positions the agency to promote compliance and to engage and inform the public about campaign finance data and rules. In order to meet these challenges, the FEC must maintain a workforce that is highly qualified to achieve the agency’s mission effectively and efficiently.

#### **3A:1 Mission Statement**

To protect the integrity of the Federal campaign finance process by providing transparency and fairly enforcing and administering Federal campaign finance laws.

### **3B: Organizational Structure**

The FEC is an independent regulatory agency responsible for administering, enforcing, defending and interpreting the FECA. The Commission is also responsible for administering the Federal public funding programs for Presidential campaigns. This responsibility includes certifying and auditing all participating candidates and committees and enforcing the public funding laws.

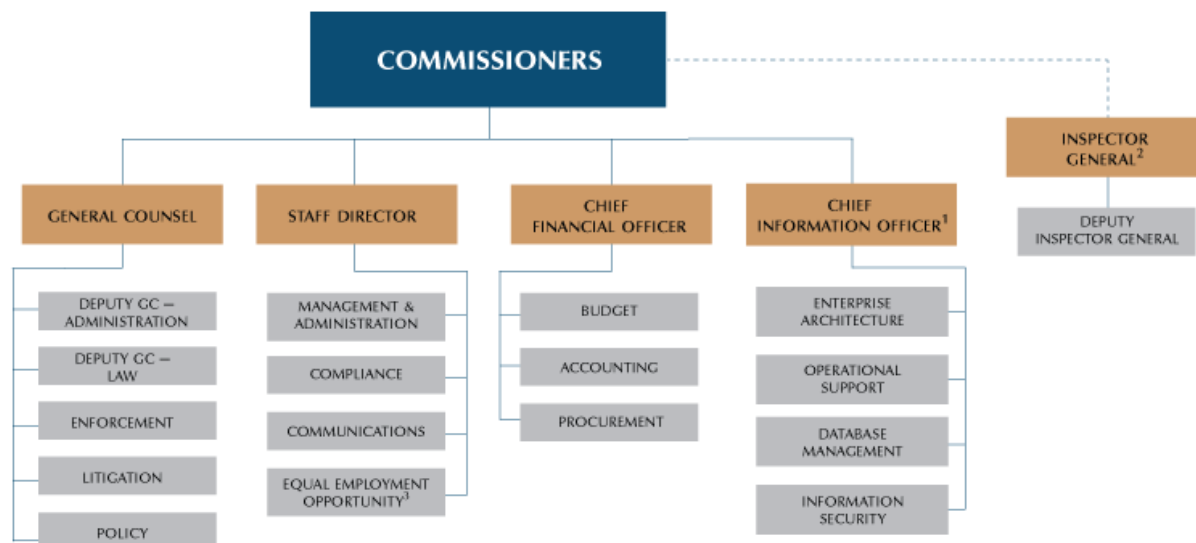
Under FECA, all Federal political committees, including the committees of Presidential, Senate and House candidates, must file reports of receipts and disbursements. The FEC makes disclosure reports available to the public through the Commission’s Internet-based public disclosure system at FEC.gov as well as through a public records office at the Commission’s Washington, D.C. headquarters. The FEC also has exclusive responsibility for civil enforcement of FECA and has litigating authority independent of the Department of Justice in U.S. District Court and the Courts of Appeals. Additionally, the Commission promulgates regulations implementing FECA and issues advisory opinions responding to inquiries.

To accomplish its legislative mandate, the FEC is directed by six Commissioners, who are appointed by the President with the advice and consent of the Senate. By law, no more than three Commissioners may be members of the same political party. Each member serves a six-year term, and two seats are subject to appointment every two years. Commissioners may serve beyond their six-year terms until new Commissioners are confirmed. The position of Commission Chair rotates among the members, with no

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<sup>34</sup> The President’s Budget identifies the lower-priority program activities, where applicable, as required under the GPRA Modernization Act of 2010, 31 U.S.C. 1115(b)(10). See <http://www.whitehouse.gov/omb/budget>.

member serving as Chair more than once during a six-year term. The Commissioners are responsible for administering and enforcing FECA and meet regularly to formulate policy and to vote on significant legal and administrative matters. FECA requires at least four votes for the Commission to approve certain official actions, thus requiring bipartisan decision-making. On May 1, 2025, the FEC lost its quorum of four Commissioners, limiting the types of official actions the Commission can take.<sup>35</sup> The FEC has its headquarters in Washington, D.C. and does not have any regional offices.



<sup>1</sup> The position of Chief Information Officer normally reports directly to the Staff Director who, in turn, reports to the Commission itself. At present, however, the same individual is serving in both the position of the Staff Director and the position of the Chief Information Officer, pursuant to an authorization by the Commission and based, in part, on an advance decision from the Comptroller General. Accordingly, the organizational chart reflects both positions – the Staff Director and the Chief Information Officer – as reporting directly to the Commission.

<sup>2</sup> The Office of the Inspector General (OIG) independently conducts audits, evaluations, and investigations. OIG keeps the Commission and Congress informed regarding major developments associated with their work.

<sup>3</sup> The Director for Equal Employment Opportunity reports to the Staff Director on administrative issues but has direct reporting authority to the Commission on all EEO matters. See 29 CFR 1614.102(b)(4).

Figure 3: FEC Organizational Chart

As noted in Figure 3 above, the offices of the Staff Director, General Counsel, Chief Information Officer and Chief Financial Officer support the agency in accomplishing its mission. The Office of the Inspector General, established within the FEC in 1989 under the 1988 amendments to the Inspector General Act, is independent and reports both to the Commissioners and to Congress. The specific roles and responsibilities of each office are described in greater detail below.

**Office of the Staff Director (OSD)**

The Office of the Staff Director consists of four offices: (1) Management and Administration; (2) Compliance; (3) Communications; and (4) Equal Employment Opportunity. The Office of Management

<sup>35</sup> Information regarding those actions the Commission can take in the absence of a quorum is detailed in Commission Directive 10. See: [https://www.fec.gov/resources/cms-content/documents/directive\\_10.pdf](https://www.fec.gov/resources/cms-content/documents/directive_10.pdf)

and Administration is responsible for the FEC's strategic planning and performance and works with the Commission to ensure the agency's mission is met efficiently. In addition, this office houses the Office of the Commission Secretary, the Office of Human Resources (OHR) and the Administrative Services Division (ASD). The primary responsibilities of the Office of Compliance are making campaign finance reports and data available to the public, review of campaign finance reports, assistance with compliance, audits, administrative fines and alternative dispute resolution. The Office of Communications includes divisions charged with making enforcement, policy and other Commission documents, as well as Presidential candidates' personal financial disclosure reports, available to the public, encouraging voluntary compliance with FECA through educational outreach and training, and ensuring effective communication with Congress, executive branch agencies, states, the media and researchers and the general public. The Equal Employment Opportunity Office promotes the establishment of a workplace environment free from harassment and discrimination by monitoring and analyzing the Commission's personnel policies, practices and procedures; offering EEO Counseling or ADR services; processing informal and formal allegations of discrimination; facilitating the accommodation process for employees with disabling conditions and providing EEO-related staff education and required training. The EEO Director reports to the Staff Director on administrative issues but has direct reporting authority on all EEO matters.<sup>36</sup>

#### □ **Office of General Counsel (OGC)**

The Office of General Counsel consists of five organizational units: (1) the Deputy General Counsel—Administration; (2) the Deputy General Counsel—Law; (3) the Policy Division; (4) the Enforcement Division; and (5) the Litigation Division. The Deputy General Counsel—Administration directly supervises the Administrative Law Team, the Law Library and all OGC administrative functions. The Deputy General Counsel—Law has the primary responsibility for assisting the General Counsel in all of the substantive aspects of the General Counsel's duties and shares in the management of all phases of OGC programs, as well as directly supervising the agency's ethics program. The Policy Division drafts for Commission consideration advisory opinions and regulations interpreting the Federal campaign finance law and provides legal advice to the FEC's compliance programs. The Enforcement Division recommends to the Commission appropriate action to take with respect to administrative complaints and apparent violations of FECA. Where authorized, the Enforcement Division investigates alleged violations and negotiates conciliation agreements, which may include civil penalties and other remedies. If an enforcement matter is not resolved during the administrative process, the Commission may authorize suit in district court, at which point the matter is transferred to the Litigation Division. The Litigation Division represents the Commission before the Federal district and appellate courts in all civil litigation involving campaign finance statutes. This Division assists the Department of Justice's Office of the Solicitor General when the Commission's FECA cases are before the Supreme Court.

#### □ **Office of the Chief Information Officer (OCIO)**

The Office of the Chief Information Officer (OCIO) consists of four units: (1) Enterprise Architecture; (2) Operational Support; (3) Data Administration; and (4) IT Security. The OCIO provides secure, stable and robust technology solutions for Commission staff and the public. OCIO both develops and maintains the systems that serve as the public's primary source of information about campaign finance

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36 See 29 CFR 1614.102(b)(4).

data and law. OCIO ensures agency employees have access to the tools and technology platforms that allow them to perform their day-to-day responsibilities administering and enforcing campaign finance law. In addition, OCIO provides a vision and leads the implementation of projects to ensure the FEC continues to modernize strategic systems in order to support the significant growth in campaign finance transactions.

#### □ **Office of the Chief Financial Officer (OCFO)**

The Office of the Chief Financial Officer consists of three offices: (1) Budget; (2) Accounting; and (3) Procurement. The OCFO is responsible for complying with all financial management laws and standards, and all aspects of budget formulation, budget execution and procurement.

### **3C: Performance Framework**

#### **3C:1 Strategic Goal**

The strategic goal of the Federal Election Commission is to fairly, efficiently and effectively administer and enforce FECA, promote compliance and engage and inform the public about campaign finance data and rules, while maintaining a workforce that delivers results.

#### **3C:2 Plans and Progress by Strategic Objective**

FECA reflects a belief that democracy works best when voters can make informed decisions in the political process—decisions based in part on knowing the sources of financial support for Federal candidates, political party committees and other political committees. As a result, the FEC’s first strategic objective is to inform the public about how Federal campaigns and committees are financed. Public confidence in the political process also depends on the knowledge that participants in Federal elections follow clear and well-defined rules and face consequences for non-compliance. Thus, the FEC’s second strategic objective focuses on the Commission’s efforts to promote voluntary compliance through educational outreach and to enforce campaign finance laws effectively and fairly. The third strategic objective is to interpret FECA and related statutes, providing timely guidance to the public regarding the requirements of the law. The Commission also understands that organizational performance is driven by employee performance and that the agency cannot successfully achieve its mission without a high-performing workforce that understands expectations and delivers results. Consequently, the FEC’s fourth strategic objective is to foster a culture of high individual and organizational performance in order to ensure that the agency accomplishes its mission efficiently and effectively. The FEC’s strategies for reaching these objectives are outlined below.

##### **3C:2.1 Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data**

*Leaders: Assistant Staff Director for Reports Analysis Division; and Deputy Chief Information Officer, Enterprise Architecture*

The FEC protects the integrity of Federal campaigns by providing transparency and fairly enforcing and administering Federal campaign finance laws. Full disclosure of the sources and amounts of campaign funds and fair enforcement of Federal campaign finance laws allow the public to make informed

decisions in the political process. Transparency requires that information is not only kept by the FEC but also provided to the public in an easily accessible way. In order to make certain that campaign finance disclosure information is quickly available and easily accessible to the public, the agency has developed application programming interfaces (APIs) and other tools to improve access to campaign finance data. The agency is also committed to providing excellent customer service to help the public find and understand campaign finance information.

## **Strategies and Next Steps**

The FEC's eFiling system acts as the point of entry for submission of electronically filed campaign finance reports, providing faster access to reports and streamlining operations. This system provides for public disclosure of electronically filed reports on FEC.gov within minutes of being filed. When a committee files a financial disclosure report on paper, the Commission ensures that a copy is available for public inspection within 48 hours of receipt, both on FEC.gov and at the FEC's offices in Washington, D.C. The FEC is committed to providing timely and transparent campaign finance disclosure to the public and delivering data in accessible and easy-to-use formats.

The number of financial transactions reported to the FEC has nearly doubled each election cycle for the past several election cycles through the 2020 cycle, resulting in a steep rise in the number of transactions that must be received, processed and made available to the public. During the 2020 election cycle, these filers reported more than 600 million financial transactions, which were reviewed by FEC staff and disclosed to the public on FEC.gov. This is more than double the number of transactions reported in the previous election cycle, and a nearly 400 percent increase compared to 2016, the preceding Presidential election cycle. During the 2022 election cycle, these filers reported more than 590 million financial transactions, which were also reviewed by FEC staff and disclosed to the public on FEC.gov. This is a nearly 120 percent increase compared to 2018, the preceding non-Presidential election cycle.

During the 2024 election cycle, the FEC received campaign finance reports with 502.7 million transactions, disclosing \$28.3 billion in receipts and \$28.0 billion in disbursements, a 1.3 percent and 3.0 percent increase, respectively, over the last Presidential election cycle. This level of reported activity places a strain on staff, systems and databases. Each transaction must be received and processed by the FEC and made available to the public on the FEC.gov. This transaction-level data is also used by the FEC internally and supports much of the FEC's mission-related work.

The FEC understands it needs to modernize its disclosure data pipeline to receive, process, review and display the increasing volume of transaction-level data reported by political committees active in Federal elections. Data pipelines are a set of automated methods and procedures that process raw data files received from filers into the primary campaign database for internal agency use and for public consumption on FEC.gov. They are essential to processing and reviewing campaign finance disclosure information in compliance with FECA's mandates. The FEC will continue to plan for a multi-year initiative to modernize and strengthen its data pipeline. Key priorities include updating legacy data processing tools, enhancing performance, transitioning to a more modern database platform, and streamlining the overall data workflow. To position the agency for successful implementation once funding is secured, the FEC is actively engaged in ongoing architecture and strategy discussions to determine the most effective modernization path forward.

**Progress Update for FY 2025**

Reports filed electronically are made available on FEC.gov and may be downloaded by the public within minutes of submission. Reports filed on paper are scanned and made available on FEC.gov within 48 hours of receipt. After reports are imaged for disclosure purposes, the information is coded and entered into the FEC’s database for review to assess accuracy and ensure complete disclosure of campaign finance information. The agency’s goal is to code and enter 65 percent of the reports within 30 days of receipt. In FY 2025 the agency processed 88 percent of reports within 30 days of receipt.

**Performance Goal 1-1: Improve the public’s access to information about how campaign funds are raised and spent.**

<b>Key Indicator: Percent of reports processed within 30 days of receipt.</b>								
<b>FY 2020 Actual</b>	<b>FY 2021 Actual</b>	<b>FY 2022 Actual</b>	<b>FY 2023 Actual</b>	<b>FY 2024 Actual</b>	<b>FY 2025 Target</b>	<b>FY 2025 Actual</b>	<b>FY 2026 Target</b>	<b>FY 2027 Target</b>
98%	89% <sup>37</sup>	98%	93% <sup>38</sup>	99%	65%	88%	65%	65%

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37 The agency’s ability to meet its target for this performance goal during FY 2021 was negatively impacted by staff shortages and an unprecedented volume of filings received during the 2020 election cycle.

38 The agency’s ability to meet its target for this performance goal during FY 2023 was negatively impacted by staff shortages and the volume of filings received during the 2022 election cycle.

### **3C:2.2 Strategic Objective 2: Promote Compliance with the FECA and Related Statutes**

*Leaders: Deputy Staff Director/Chief Compliance Officer; General Counsel; Deputy General Counsel—Administration; Assistant Staff Director, Information Division*

Helping the public understand its obligations under FECA is an essential component of voluntary compliance. The FEC places a significant emphasis on encouraging compliance. The FEC measures its progress in meeting this Objective through two performance measures, discussed separately below. The first measures the agency's efforts to encourage voluntary compliance through educational outreach and information and the second measures the FEC's efforts to seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs.

#### **Strategies and Next Steps**

*Encourage voluntary compliance with FECA requirements through educational outreach and information.*

Helping those subject to the Commission's jurisdiction understand their obligations under federal campaign finance laws is an essential component of voluntary compliance. The FEC's education and outreach programs provide information necessary for compliance with campaign finance laws and give the public the context necessary to interpret the campaign finance data filers disclose.

Using the FEC's toll-free line and public email accounts, staff in the Information Division, Reports Analysis Division, Congressional Affairs Office and Public Disclosure and Media Relations Division respond to thousands of inquiries each year regarding campaign finance data disclosed to the public and questions about how to comply with FECA and its reporting requirements.

The Commission also encourages voluntary compliance by hosting interactive training programs for candidates, parties and political action committees. Online discussions of campaign finance topics, webinars and in-person seminars address recent changes in the law and focus on fundraising, methods of candidate support and reporting regulations.

Another online training service enables political committees, reporters, students and other groups to schedule live, interactive online training sessions with FEC staff. This on-demand service allows the FEC to provide tailored, distance learning presentations and training to the public in a manner that significantly increases the availability of FEC staff to serve the public. The service also offers an efficient and effective way for alternative dispute resolution and other enforcement respondents to satisfy the terms of their agreements with the agency.

In addition to these interactive training programs, the Commission provides a myriad of educational resources on its YouTube channel (FECTube) and website (FEC.gov). FECTube offers a wide range of instructional videos and tutorials—including curated playlists for candidates, parties, PACs and individual citizens—that enable users to obtain guidance tailored to their specific activities. FEC.gov visitors can access comprehensive guides written in plain language that summarize the rules for all types of committees, from registration to termination. Although these guides are also available in print, the FEC's transition to web-based media has allowed the agency to reduce significantly its printing, storage

and mailing costs while at the same time encouraging new and expanded ways of communicating with the public on FEC.gov. For example, visitors can sign up to receive email notifications any time website content that interests them is updated and when campaign finance reports are received by the agency.

FEC.gov is also an important source of instantly accessible information about the FECA, Commission regulations, and Commission proceedings. In addition to viewing campaign finance data, anyone with Internet access can use FEC.gov to track Commission rulemakings, search advisory opinions, audits, and closed enforcement matters, view campaign finance data, and find reporting dates.

*Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs.*

The FEC has formed strategies for ensuring that its enforcement and compliance programs are fair, effective and timely. The Commission's statutory obligation is to administer, interpret and enforce FECA, which serves the compelling governmental interest in deterring corruption and the appearance of corruption in financing federal elections. In doing so, the Commission remains mindful of the First Amendment's guarantees of freedom of speech and association, and the practical implication of its actions on the political process.

The FEC has exclusive jurisdiction over civil enforcement of Federal campaign finance laws. It consults with the U.S. Department of Justice, as appropriate, on matters involving both civil and criminal enforcement of FECA. Commission enforcement actions, which are handled primarily by OGC, originate from a number of sources, including external complaints, referrals from other government agencies and matters generated by information ascertained by the Commission in the normal course of carrying out its supervisory responsibilities. Enforcement matters are handled by OGC pursuant to the requirements of the FECA. If the Commission cannot settle or conciliate a matter involving an alleged violation of FECA, the Commission may initiate civil litigation by filing and prosecuting a civil action in Federal district court to address the alleged violation. Closed enforcement matters are available on FEC.gov.

To augment OGC's traditional enforcement role, the Office of Compliance manages several programs that seek to remedy alleged violations of the Act and encourage voluntary compliance. These programs include: (1) the Alternative Dispute Resolution Program, (2) the Administrative Fine Program and (3) the Audit Program. The Commission's Alternative Dispute Resolution Program is designed to resolve matters more swiftly by encouraging the settlement of less-complex enforcement matters with a streamlined process that focuses on remedial measures for candidates and political committees, such as training, internal audits and hiring compliance staff. Violations involving the late submission of, or failure to file, disclosure reports are subject to the Administrative Fine Program. This program is administered by the Reports Analysis Division (RAD) and the Office of Administrative Review (OAR), which assess monetary penalties and handle challenges to the penalty assessments. The Audit Program conducts "for cause" audits in those cases where political committees have failed to meet the threshold requirements for demonstrating substantial compliance with FECA and conducts mandatory audits under the public funding statutes. Commission-approved threshold requirements used by RAD and the Audit Division are available on FEC.gov, subject to limited redactions.

The Office of Compliance's RAD reviews an ever-increasing volume of reports to track compliance

with the law and to ensure that the public record provides a full and accurate representation of reported campaign finance activity. If the FEC's review identifies an apparent violation or raises questions about the information disclosed on a report, RAD sends a request for additional information (RFAI) letter to the filer, affording an opportunity to take remedial action or correct the public record, if necessary. If the filer is able to resolve the FEC's concerns, it may avoid an enforcement action. If not, the Commission has several tools available to it, such as the Administrative Fine Program, the Audit Program, the Alternative Dispute Resolution Program and the traditional enforcement program.

The Alternative Dispute Resolution (ADR) Program was implemented in FY 2001 with the primary objective to enhance the agency's overall effectiveness through more expeditious resolution of enforcement matters with fewer resources required to process complaints and internal referrals. A case is closed when the Commission votes on the recommendation made by the ADR Office as to what final action should be taken.

In response to a legislative mandate, an Administrative Fine (AF) Program was implemented in July 2000 to address late and non-filing of disclosure reports in a more efficient and effective manner. The AF Program is administered by RAD and the OAR which are within the Office of Compliance. Legislation was enacted in 2023 to extend the AF Program through reports disclosing campaign financial activity in 2033.

The Commission's Audit Division generally conducts audits when a committee appears not to have met the threshold requirements for substantial compliance. The audit determines whether the committee complied with the limitations, prohibitions and disclosure requirements of FECA. In addition, the Commission is required by law to audit Presidential campaigns that accept public funds.

### **Progress Update for FY 2025**

*Encourage voluntary compliance with FECA requirements through educational outreach and information.*

During FY 2025, the Commission continued to meet its mandate to assist the public by providing access to campaign finance compliance information. The Commission is deeply committed to providing candidates, committees and the public timely advice and support so they can fully understand and comply with FECA. The Commission also continues to strive to better understand and meet the needs of the public and other stakeholders. During FY 2025, the FEC produced a variety of instructional videos and web content and conducted numerous online training workshops. In addition, the Commission hosted an in-person seminar at its headquarters. The FEC again exceeded its customer service target for conferences and webinars, achieving an average attendee satisfaction rating of 4.56 on a five-point scale.

*Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs.*

The Office of General Counsel continues to seek improvement in meeting its obligations to the Commission and the public to handle its caseload efficiently and effectively despite staffing challenges. In FY 2025, the Commission closed 154 enforcement cases in an average of 502 days, which included \$1,045,500 in negotiated civil penalties. The Commission closed 94 cases (61 percent) within 15

months.

**Performance Goal 2-1: Encourage voluntary compliance with FECA requirements through educational outreach and information.**

<b>Key Indicator: Educational outreach programs and events achieve targeted satisfaction rating on user surveys.</b>								
<b>FY 2020 Actual</b>	<b>FY 2021 Actual</b>	<b>FY 2022 Actual</b>	<b>FY 2023 Actual</b>	<b>FY 2024 Actual</b>	<b>FY 2025 Target</b>	<b>FY 2025 Actual</b>	<b>FY 2026 Target</b>	<b>FY 2027 Target</b>
4.51	4.36	4.55	4.49	4.38	3.5 or higher on a 5.0 scale	4.56	3.5 or higher on a 5.0 scale	3.5 or higher on a 5.0 scale

**Performance Goal 2-2: Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs.**

<b>Key Indicator: Of the enforcement matters resolved during the fiscal year, the percentage that was resolved within 15 months of the date of receipt.</b>								
<b>FY 2020 Actual</b>	<b>FY 2021 Actual</b>	<b>FY 2022 Actual</b>	<b>FY 2023 Actual</b>	<b>FY 2024 Actual</b>	<b>FY 2025 Target</b>	<b>FY 2025 Actual</b>	<b>FY 2026 Target</b>	<b>FY 2027 Target</b>
62%	34% <sup>39</sup>	22% <sup>40</sup>	54%	41% <sup>41</sup>	35%	61%	35%	35%

<sup>39</sup> The agency’s performance under this measure was negatively impacted by the lack of a quorum for most of FY 2020.

<sup>40</sup> The agency’s performance under this measure was negatively impacted by the lack of a quorum for most of FY 2020.

<sup>41</sup> In FY 2024, the Enforcement Division was severely understaffed compared to previous fiscal years. The lack of adequate staffing contributed to a decrease in some of the key metrics.

### **3C:2.3 Strategic Objective 3: Interpret the FECA and Related Statutes**

*Leader: General Counsel; Deputy General Counsel— Administration*

Commission initiatives, Congressional action, judicial decisions, petitions for rulemaking or other changes in campaign finance law may necessitate that the Commission update or adopt new regulations. Consequently, the FEC undertakes rulemakings either to write new Commission regulations or revise existing regulations. The Commission also provides guidance on how FECA applies to specific situations through the advisory opinion process and represents itself in most litigation before the Federal district and appellate courts. The Commission's three primary means for providing interpretive guidance for FECA and related statutes are discussed below.

#### **Regulations**

The Policy Division of OGC drafts various rulemaking documents, including Notices of Proposed Rulemaking (NPRMs), for Commission consideration. NPRMs provide an opportunity for the public to review proposed regulations, submit written comments to the Commission and, when appropriate, testify at public hearings at the FEC. The Commission considers the comments and testimony and deliberates publicly regarding the adoption of the final regulations and the corresponding Explanations and Justifications, which provide the rationale and basis for the new or revised regulations.

#### **Advisory Opinions**

Advisory opinions (AO) are official Commission responses to questions regarding the application of Federal campaign finance law to specific factual situations. FECA generally requires the Commission to respond to AO requests within 60 days. For AO requests from candidates in the two months leading up to an election, FECA requires the Commission to respond within 20 days. On its own initiative, the Commission also makes available an expedited process for handling certain time-sensitive requests that are not otherwise entitled to expedited processing under FECA. The Commission strives to issue these advisory opinions in 30 days.

#### **Defending Challenges to the FECA & Bringing Suit to Enforce the FECA**

The Commission represents itself in most litigation before the Federal district and appellate courts and before the Supreme Court with respect to some cases involving publicly financed presidential candidates. It also has primary responsibility for defending FECA and Commission regulations against court challenges. In addition, FECA authorizes the Commission to institute civil actions to enforce the Act.

#### **Strategies and Next Steps**

The Office of General Counsel continues to focus on its processes to ensure that staff provides timely and well-written advice to the Commission so that it can meet its obligations to administer and enforce campaign finance law. The Commission considers it a high priority to ensure that guidance is provided through the advisory opinion process within the timeframes established by the Act. OGC continues to ensure that court filings meet all deadlines and rules imposed by the courts and has set as a performance

target meeting 100 percent of these deadlines and rules.

**Progress Update for FY 2025**

During FY 2025, the Commission met its goal to issue 100 percent of advisory opinions within the applicable statutory deadline for each request. During FY 2025, the Commission completed work on 9 AO requests (AOR) and issued 8 opinions in response to those requests. Seven AOR that the Commission completed in FY 2025 were 60-day AORs (one of which received an extended deadline). One of the AORs that the Commission completed in FY 2025 was a 20-day AOR, which received an extended deadline. The average number of days from receipt of a complete AOR to Commission action on it was 39 days for 60-day AORs that did not receive an extended deadline, 64 days for the 60-day AOR that did receive an extended deadline, and 22 days for the 20-day AOR that did receive an extended deadline. The Commission also provided legal guidance within statutory and court-ordered deadlines 100 percent of the time.

**Performance Goal 3-1: Provide timely legal guidance to the public.**

<b>Key Indicator: Percent of legal guidance provided within statutory and court-ordered deadlines.</b>								
<b>FY 2020 Actual</b>	<b>FY 2021 Actual</b>	<b>FY 2022 Actual</b>	<b>FY 2023 Actual</b>	<b>FY 2024 Actual</b>	<b>FY 2025 Target</b>	<b>FY 2025 Actual</b>	<b>FY 2026 Target</b>	<b>FY 2027 Target</b>
88%	100% <sup>42</sup>	100% <sup>43</sup>	100% <sup>44</sup>	100% <sup>45</sup>	100%	100% <sup>46</sup>	100%	100%

42 The Commission obtained extensions to consider five advisory opinion requests in FY 2021; one of those extensions was lengthened by the lack of a Commission quorum during the first quarter of FY 2021.

43 The Commission obtained extensions to consider eleven advisory opinion requests in FY 2022.

44 The Commission obtained extensions to consider four advisory opinion requests in FY 2023.

45 The Commission obtained extensions to consider seven advisory opinion requests in FY 2024.

46 The Commission obtained extensions to consider two advisory opinion requests in FY 2025.

### **3C:2.4 Strategic Objective 4: Foster a Culture of High Individual and Organizational Performance**

*Leaders: Deputy Staff Director for Management and Administration/Chief Human Capital Officer and Deputy Chief Information Officer, Enterprise Architecture*

One of the objectives from the FEC's Strategic Plan, FY 2026-2030, Foster a Culture of High Individual and Organizational Performance, cuts across the organization and reflects the agency's strategic priorities for improving the efficiency and effectiveness of its workforce and management processes. The FEC's primary measure of success in developing and maintaining a result-driven workforce is at the program level: a workforce that delivers results will meet the internal performance targets set by the Commission.

#### **Strategies and Next Steps**

The Commission requires quarterly updates from agency offices and divisions to ensure agency staff continuously meet internal goals to efficiently and effectively meet the statutory mission of the agency while continuing to provide excellent service to the public.

To improve the efficiency and cost effectiveness of agency operations, the FEC is undertaking several multi-year IT modernization projects to update the FEC's systems and data processing capabilities to use cloud-native architecture, improve services provided to the public and better ensure the security of the FEC's networks, systems and data. Modernizing and refactoring the agency's legacy applications, systems and data pipeline will help the FEC streamline the processing of information provided to the public while at the same time improving the systems and tools used by agency staff to provide services to the public and ensure compliance with the campaign finance law.

#### **Progress Update for FY 2025**

During FY 2025, FEC offices and divisions met 93 percent of the internal goals tracked quarterly by the Commission to ensure the FEC succeeds at meeting the agency's mission.

**Performance Goal 4-1: Foster a workforce that delivers results.**

<b>Key Indicator: Commission-required quarterly updates meet targeted performance goals.</b>								
<b>FY 2020 Actual</b>	<b>FY 2021 Actual</b>	<b>FY 2022 Actual</b>	<b>FY 2023 Actual</b>	<b>FY 2024 Actual</b>	<b>FY 2025 Target</b>	<b>FY 2025 Actual</b>	<b>FY 2026 Target</b>	<b>FY 2027 Target</b>
73% <sup>47</sup>	87% <sup>48</sup>	87% <sup>49</sup>	67% <sup>50</sup>	80%	65%	93%	65%	65%

**3D: Implementation Factors**

**3D:1 Major Management Priorities, Challenges and Risks**

Each year the FEC’s Inspector General (IG) is required to provide a summary and assessment of the most serious management and performance challenges facing the FEC. In a memorandum dated December 15, 2025, the IG identified four challenges facing management:

- Loss of quorum and loss of bipartisan membership
- Resource management
- Modernization of information systems and cybersecurity
- Growth of election contributions
- Outdated statutory pay structure

The IG’s assessment and the FEC’s response are included in the FEC’s FY 2025 Agency Financial Report<sup>51</sup>.

**3D:2 Data Validation and Verification**

OMB Circular A-136, as revised, and the GPRA Modernization Act of 2010 (GPRAMA) require each agency to describe the accuracy and reliability of the data used to measure progress toward its performance goals, including an identification of the means used to verify and validate the measured values and the source for the data. Agencies are encouraged to determine the appropriate frequency of

47 The agency’s performance under this measure was negatively impacted by the lack of a quorum for most of FY 2020.

48 The agency’s ability to meet its target for this performance goal during FY 2021 was negatively impacted by staff shortages and an unprecedented volume of filings received during the 2020 election cycle.

49 The agency’s ability to meet its target for this performance goal during FY 2022 was negatively impacted by the lack of a quorum for most of 2020 and staffing shortages during FY 2022.

50 Although this target was met, the agency’s performance toward this target during FY 2023 was negatively impacted by staff shortages and the volume of filings received during the 2022 election cycle.

51 See: <https://www.fec.gov/resources/cms-content/documents/FEC-FY-2025-Agency-Financial-Report.pdf>.

data validation and verification needed for the intended use and should allocate appropriate resources to carry out validation and verification on an appropriately periodic basis.

Many of the FEC's performance measures set goals for the timely completion of tasks that are either internally generated or triggered through requests, reports or complaints filed with the Commission. As a result, the universe of data the FEC must collect and verify to support its performance information is generally small, centrally located and easily verified. The FEC tracks data to support its performance measures through its internal databases and with spreadsheets maintained by program managers. In cases where performance is measured based on the timeframe for completing a decision, matter or inquiry, the universe of data to be measured and the dates on which performance milestones are reached are tracked electronically. Data provided by the agency's litigation, policy, enforcement and compliance offices are reported at least quarterly to the Commission, which provides regular opportunities for the accuracy of the data to be verified.

The FEC also tracks its performance in making campaign finance information available to the public. Reports filed with the FEC represent the largest universe of data the agency must consider in determining its performance. FEC staff process the data contained in campaign finance reports so that the information can be accurately organized, categorized and searched in the agency's databases. The FEC sets as a performance goal processing 65 percent of reports through its data and coding system within 30 days. The entry and completion dates for each report are retrievable through the FEC's electronic systems.

The FEC has completed a broad review of its methods for verifying and validating performance as part of its overall assessment of its strategic and performance plans. The FEC has identified senior-level staff and key managers to serve as goal leaders for each area of the strategic and performance plans. In addition, each strategic activity in the Strategic Plan has been assigned one or more program managers, who are responsible for the delivery and performance reporting of that activity. These managers will be serving as measure managers and data quality leads to ensure the completeness, consistency and accuracy of the reported data of their respective strategic activity.

### **3E: Conclusion**

As described in this section, the FEC's plans and strategies for FYs 2026 and 2027 are designed to ensure that the agency is well-prepared to provide full campaign finance transparency to the public despite the expected increase in campaign finance activity.

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## Office of the Inspector General's Fiscal Year 2027 Budget Request

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The Inspector General Act of 1978, as amended, requires each Inspector General to transmit a budget request to the head of the establishment or designated Federal entity to which the Inspector General reports specifying:

- the aggregate amount of funds requested for the operations of the Office of the Inspector General (OIG);
- the portion of this amount requested for OIG training, including a certification from the Inspector General that the amount requested satisfies all OIG training requirements for that fiscal year; and
- the portion of this amount necessary to support the Council of the Inspectors General on Integrity and Efficiency (CIGIE).

In developing its proposed budget, the OIG has focused on fulfilling the Administration's desire to ensure the highest-quality, most efficient delivery of its statutorily mandated functions. With this in mind, the Inspector General submits the following information regarding the OIG's requested budget for fiscal year (FY) 2027:

- \$1,634,500 in the aggregate for the operations of the OIG;
- \$18,000 of that amount for OIG training;<sup>52</sup> and
- \$6,600 of that amount to support the CIGIE.<sup>53</sup>

The OIG intends to utilize its limited resources to conduct audits, evaluations, and other reviews of the FEC's programs and operations. These engagements would be based on the outcome of the OIG's annual risk assessment, which takes into account stakeholder requests and concerns, among other factors. The OIG notes that this budget request represents a 28 percent decrease from our FY 2025 request due to the implementation of several cost savings measures in 2025 and 2026.<sup>54</sup>

I, Susan L. Ruge-Hudson, certify as the FEC Inspector General that the amount I have requested for training satisfies all OIG training requirements for FY 2027.

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52 The professional standards that govern the OIG's work require that most OIG employees must complete 80 hours of Continuing Professional Education (CPEs) every two years. The \$18,000 figure would provide \$3,000 per person to fulfill those requirements. As we have in recent years, the OIG will strive to minimize our training costs and we will of course continue to prioritize free trainings that are offered to the federal oversight community. However, we note that as a result of the Administration's initiative to reduce government spending, many of those free trainings have been canceled.

53 This figure assumes the level of funding that the OIG will be required to provide to CIGIE will continue to be .4 percent of the OIG's budget.

54 These cost saving measures included not filling any of the three vacancies that currently exist, obtaining legal counsel through an interagency agreement with the Government Publishing Office OIG, and decreasing the level of outside audit support that we obtain via a blanket purchase agreement with an independent public accounting firm.

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## OIG Summary of Outstanding FEC Audit Recommendations

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The Good Accounting Obligation in Government Act requires each agency to include, in its annual budget justification, a report that identifies each public recommendation issued by the agency's Inspector General that has remained unimplemented for one year or more from the annual budget justification submission date. Accordingly, as of September 1, 2025, the OIG reports a total of 12 open recommendations with the FY 2027 budget justification.

Report Title	Date Issued	Total # of Recs.	# Open Recs. as of September 1, 2025
<a href="#"><u>Performance Audit of FEC's Security Patches and Vulnerabilities Management Programs for the Fiscal Year Ending September 30, 2024</u></a>	6/30/2025	10	10
<a href="#"><u>Review of Commission Directive 06</u></a>	10/5/2022	1	1
<a href="#"><u>Review of the FEC Travel and Purchase Card Programs</u></a>	8/1/2023	5	1
Totals		16	12