

FEDERAL ELECTION COMMISSION

FISCAL YEAR 2019

CONGRESSIONAL BUDGET JUSTIFICATION



February 12, 2018

Concurrently submitted to Congress and the Office of Management and Budget

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SUMMARY OF FY 2019 BUDGET JUSTIFICATION

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” or the “Act”), as amended.¹ As the foundation of Federal campaign finance regulation, FECA reflects Congress’s efforts to prevent corruption through two principal means. First, it ensures that voters have access to information about the sources 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.²

For the fiscal year (FY) 2019 Budget Submission, the FEC’s total requested funding level is \$71.25 million, which is equal to the FEC’s FY 2018 budget request. Over the recent past, the FEC has increasingly focused on the Agency’s efficiency, effectiveness and accountability. For example, the FEC has made a number of investments in various IT systems that have started to result in savings, and the Agency anticipates savings from previous investments as well as additional savings from new investments. As a result of these efforts, and in order to limit this funding request to \$71.25 million, this funding request seeks funds that could support 335 FTE, which is ten fewer than were included in the Agency’s FY 2018 request. Additionally, the requested amount for IT Contracts is nearly seven percent less than the amount requested for the previous year, a reduction of approximately \$465,000. These savings in IT Contracts are the result of Agency staff’s efforts and commitment to reducing operational and maintenance expenses related to eliminating a legacy system and infrastructure.

In response to the President’s Executive Order entitled Comprehensive Plan for Reorganizing the Executive Branch,³ the FEC has developed an Agency Reform Plan that strives to build on these improvements in efficiency, effectiveness and accountability to achieve further savings. The FEC’s Agency Reform Plan is Section 4 of this document.

FEC Budget Request

The FEC protects the integrity of the Federal campaign finance process by providing the public with accurate and accessible information about how candidates raise and spend funds to support their campaigns. In an average fiscal year, the FEC receives campaign finance reports, statements and other disclosure documents from more than 12,000 political committees and other filers. During FY 2017, the FEC received 82,136 campaign finance disclosure documents disclosing more than 107.7 million transactions, which were reviewed by FEC staff and disclosed to the public on the FEC’s website.

¹ Public Law 92-225, 86 Stat. 3 (1972) (*codified at 52 U.S.C. §§ 30101-45*).

² The Commission’s responsibilities for the Federal public funding programs are contained in the *Presidential Election Campaign Fund Act*, Public Law 92-178, 85 Stat. 562 (1971) (*codified at 26 U.S.C. §§ 9001-13*) and the *Presidential Primary Matching Payment Account Act*, Public Law 93-443, 88 Stat. 1297 (1974) (*codified at 26 U.S.C. §§ 9031-42*).

³ Exec. Order No. 13,781, 82 Fed. Reg. 13,959 (Mar.16, 2017).

The volume of financial transactions disclosed during FY 2017 represented a 279 percent increase over the number of transactions disclosed during FY 2015, continuing the long-term trend of an increasing volume of reported campaign finance data to be received, processed and disclosed by the Agency.

By providing the public with transparency regarding campaign financing and ensuring that campaign finance law is fairly and effectively enforced and administered, the Commission provides the public with crucial information. To support this mission, the FEC provides the public with campaign finance information and gives timely advice and support so that candidates, committees and the public can fully understand and comply with the requirements of campaign finance law. The Commission is committed to providing excellent service to the American people by offering timely and comprehensive access to reported campaign finance data and ensuring that information and data are provided in an intuitive and easy-to-use manner. In order to make certain that campaign finance disclosure data are quickly available and easily accessible to the public, and that the Commission provides legal and compliance information that is easy for a broad audience to search, understand and use, the Commission is undertaking multiyear efforts to modernize and redesign the Agency's eFiling system and website, as well as the infrastructure that supports the FEC's IT systems. The FEC's FY 2019 request includes funds to continue these projects to increase the efficiency and effectiveness of the Agency's service delivery to the public. These efforts will not only provide better and more accessible information to the public, but will also aid in the Agency's FY 2019 priority to improve its cyber security posture.

An appropriation for the FEC budgeted at \$71.25 million for FY 2019 would permit the Agency to carry out its mission and accomplish the priorities described herein during FY 2019.

MISSION STATEMENT

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 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 *Act's* limits, prohibitions and disclosure provisions. Because of the large and rising number of political committees and the ever-growing number of financial disclosure reports filed with the FEC, voluntary compliance is essential to enforcing the requirements of the *Act*. 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 Budget Justification is organized in four sections. Section 1 addresses the Agency's purpose and priorities in FY 2019. 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 2019. Section 4 is the Agency's Reform Plan.

Section 1: Purpose and Priorities in FY 2019

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. The *Act* 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 makes available on its website the campaign finance disclosure reports all Federal candidates and Federal political committees must file, as required by the *Act*. 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 the Agency's website at www.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 the *Act*. The Commission also has a statutory responsibility to issue advisory opinions responding to inquiries regarding interpretation and application of the *Act* and the Commission's regulations to specific factual situations.

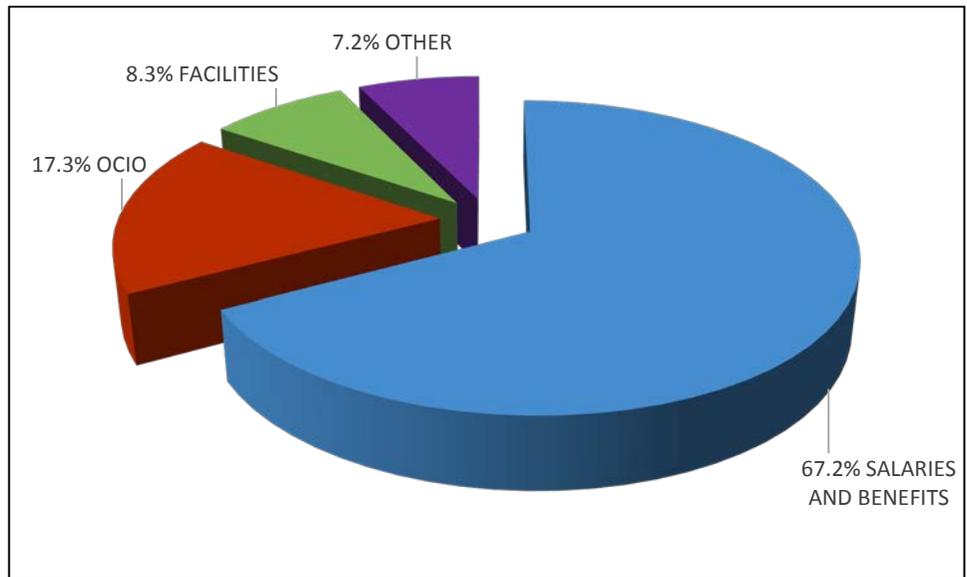
The FEC's Strategic Plan for FY 2018 through FY 2022, developed pursuant to the *Government Performance and Results Act of 1993 (GPRA)*⁴ and the *GPRA Modernization Act of 2010*,⁵ provides the Agency's strategic management framework. This framework is designed to ensure that every employee works in support of the FEC's strategic goal and objectives and that the effectiveness of these efforts can be regularly and meaningfully measured.

⁴ Public Law 103-62, 107 Stat. 285 (1993) (*codified at 31 U.S.C. § 1115 et seq.*).

⁵ Public Law 111-352, 124 Stat. 3866 (2011) (*codified at 31 U.S.C. §§ 1115-24*).

The FEC is funded by a single annual appropriation for salaries and expenses and is authorized to collect fees only to offset the costs of the Agency’s educational conferences. The Agency received two-year funds in FY 2016 and FY 2017 to cover expenses related to the expiration of the FEC’s office space lease. More than two-thirds of the Agency’s operational expenses are composed of personnel salary and benefits. Of the Agency’s remaining operational expenses, the largest categories are IT initiatives, including IT security initiatives, and facilities. These three requirements constitute over 90 percent of the Agency’s budget. Actual spending for FY 2017, which is shown in Figure 1 below, reflects the historical trend. The FEC expects the percentages in each category for its FY 2019 operational budget will be comparable to FY 2017.

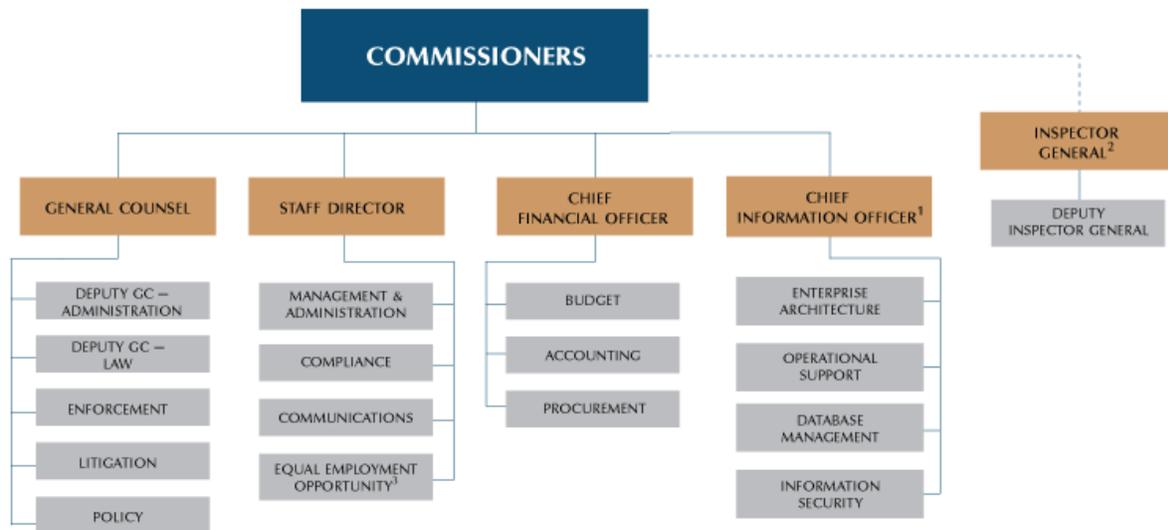
Figure 1 – FY 2017 Operational Obligations by Major Category as of September 30, 2017*



* Excludes \$8 million for lease termination expenses

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*,⁶ 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/>.



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).

⁶ Public Law 100-504, 102 Stat. 2515 (1988).

1B: FY 2019 Priorities

The FEC priorities for FY 2019 are in line with the Agency's FY 2018 to 2022 strategic plan and are limited to those needs that will allow the Agency to fulfill its mission as required by law. Funding at the full amount of this request, \$71.25 million, would permit the FEC to take measures to enhance the delivery of campaign finance data and legal resources. Full funding would also improve the Agency's systems and processes, allowing the Commission to reduce dependency on costly legacy systems and improve the efficiency of the Agency's IT infrastructure, including migration to cloud-hosted data and services, improvements to the eFiling platform and continued enhancements to cyber security and tools. These priorities will ensure that the Agency can make the best use of limited staff resources and continue to meet increasing public demand for its services. These are the FEC's priorities for FY 2019, and they are discussed in more detail below.

Meeting the Public's Information Needs while Improving Efficiency and IT Security

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 robust access to campaign finance data, compliance information and legal resources. Funding at the full amount of this request, \$71.25 million, would permit the FEC to improve the quality of services delivered to the public.

The FEC provides free electronic filing software, FECFile, to support political committees in reporting their campaign finance activity to the FEC. During FY 2017, the FEC completed and published a study to determine ways to modernize the Agency's eFiling system, platform and software to receive better quality data, be more responsive to user needs and handle the increasing volume of data reported.⁷ During FY 2018, the FEC began implementing improvements. In this request, the Agency seeks funds for FY 2019 to continue implementing improvements to its eFiling platform consistent with the study findings. Planned improvements to the eFiling platform will improve ease of filing for users by allowing greater operating system flexibility when generating filings for submission to the Commission. The FEC's new eFiling platform will also improve the process for validating filings prior to acceptance and generate modern file outputs that will provide for more flexibility in accessing data. In addition, the modernization efforts will provide for seamless integration with the data portion of the website and, therefore, more efficient use of the Agency's resources. The study of the FEC's eFiling system showed that 59 percent of electronic filers use the Agency's software. Improvements to modernize this tool continues to be an important priority for the Commission.

⁷ Available at <https://fec.gov/about/reports-about-fec/agency-operations/e-filing-study-2016/>.

Funding at the full request level will also allow the FEC to continue work on a multi-year effort to redesign its website. In partnership with 18F, an organization within the General Services Administration (GSA), the FEC developed an agile, navigable, user-based online platform to deliver campaign finance information to its diverse base of users. The FEC launched the new website in May 2017. The FEC provides the public with a wealth of complex information, including current and historical campaign finance data, detailed information regarding the requirements of the campaign finance law and legal resources such as advisory opinions issued by the Commission and information on closed enforcement matters. The redesigned website provides open, intuitive ways for the public to access and utilize information such as campaign finance data, compliance tools and legal resources. In FY 2019, the FEC will continue to enhance its website and continue to implement the redesign project that was begun in partnership with 18F.

In conjunction with the redesign of the Agency's website, the FEC has begun the process of migrating appropriate data and systems, such as the campaign finance database, to a cloud environment. Cloud hosting offers a number of benefits for the FEC in particular. The Agency's Internet traffic is variable, with many more visitors accessing the website during election years and near reporting deadlines. In addition to website visitors, filers need to access the electronic filing system and Commission staff need to access applications, including the website and databases, to perform their work-day duties. With a cloud-hosted application and database infrastructure, the FEC will only need to pay for the actual usage, rather than constantly maintaining the capacity to support peak usage, even during periods of reduced usage. Website downtime will be minimized and server maintenance will be managed by the cloud computing provider.

In addition, the move to a cloud-hosted model provides the Commission with opportunities to retire a number of costly legacy systems and reduce the Agency's data center footprint.⁸ The FEC anticipates that completing the migration of its campaign finance database and website will allow for the retirement of one physical datacenter in calendar year 2017. Planned improvements to the eFiling system, which was designed in the mid-1990s, will provide an opportunity to migrate the eFiling data center to a cloud environment as well, reducing our costs for the support and maintenance of the legacy eFiling physical data center. Thus, in addition to improving service delivery to the public, migrating to a cloud environment will allow the Agency to reduce the long-term costs of maintaining IT legacy systems. Funding at the level requested for FY 2019 will permit the Commission to continue the migration to cloud hosting with the goal of reducing costs associated with the Agency's data center footprint and providing more responsive customer service. For FY 2019, the Agency has set a performance goal of reducing reliance on physical data centers over the next four years.

The FEC is also committed to ensuring the security of its information, from protecting the integrity and accessibility of the database of campaign finance information made available to the public on the FEC website to protecting the Agency's internal networks and data. In partnership with the Department Homeland Security (DHS), the FEC conducted a security architecture gap analysis (cyber.gov initiative) to determine vital steps to further strengthen its security perimeter in FY

⁸ The FEC's efforts to reduce spending on operation and maintenance costs is consistent with the Government Accountability Office's May 2016 report, *Federal Agencies Need to Address Aging Legacy Systems*.

2017. Funding requested for FY 2019 will allow the FEC to continue to respond to the results of this gap analysis and enable the Commission to improve the capabilities for detecting, protecting against and responding to attacks on FEC networks.

Developing an Innovation Center

Consistent with its commitment to fostering the talents and skills of its employees and providing excellent service to the public, the Commission has developed a bold plan to create a cross-functional group within the agency to develop and implement user-centered, evidence-based design solutions for achieving the Agency's mission efficiently and effectively. The team will leverage technological advancements to improve the delivery of mission critical functions. This team will improve organizational decision making and be tasked with harnessing the creativity and ideas of Agency employees, and emerging technologies, to restructure systems, tools and processes, while building a 21st century IT infrastructure to better serve the American public.

During FY 2018, the agency will conduct a study of successful innovation centers, both inside and outside of government, and develop an implementation plan and metrics for program success. The Commission has set as a performance measure in the FY 2019 Annual Performance Plan to implement an Innovation Center within the agency during FY 2019.

Fostering a Culture of High Performance

Key to all of these efforts are the FEC's continuing efforts to maintain and recruit a diverse and high-performing workforce. The FEC's greatest resource is its knowledgeable staff. To continue to improve the organization's performance, the FEC will increase its efforts to identify diverse and highly qualified recruits, and to maintain the current high performance of staff.

Section 2: Budget Overview

2A: OMB Budget Guidance Level

In this section, pursuant to the Office of Management and Budget (OMB) guidance, budget increases and decreases are identified, and the FY 2019 budget request is compared to the President's FY 2018 Budget. For FY 2019, the proposed operating budget is equal to the FY 2018 operating budget. The increases and decreases are shown below.

Table 1
Changes from President's FY 2018 Budget to FY 2019 Agency Request

Category	Amount
FY 2018 President's Budget (Excludes Lease Expiration Expenses)	\$71,250,000
Personnel Compensation and Benefits	923,419
Personnel Changes Subtotal:	\$923,419
Non-Personnel Changes	
Contracts and Other Services	\$92,904
Federal Goods and Services	61,435
Communications, Utilities and Postage	37,742
Training, Commercial Fed and Tuition	23,134
Supplies and Materials	17,660
Travel and Transportation	15,435
GSA Rent	-141,120
IT Contracts	-464,793
Non Capitalized and Capitalized Equipment	-565,516
Non-Personnel Changes Subtotal:	-923,419
Total Change:	0
FY 2019 Budget Request	71,250,000

2A.1: Description of Budget Increases and Decreases

Program Increases and Decreases.....\$0/-10 FTE

Personnel Increases\$923,419/-10 FTE

The funding would cover higher salary and retirement benefits. The FY 2019 funding request could support 335 FTE for FY 2019. Total funding at \$71.25 million would allow the FEC to maintain the quality of services it delivers to the public and pursue the identified priorities in section 1. The FEC has focused on ensuring that the Agency’s workforce is appropriately sized; in fact, FY 2019 budget request includes funds for ten fewer FTEs than were included in its FY 2018 budget request. The Agency continues filling approved vacancies in key positions in FY 2018. The funding would also assist the FEC with recruiting and maintaining a mission driven, high-performing staff.

Non-Personnel Increases and Decreases (\$923,419)

Contracts and Other Services\$92,904

This increase is for contract support and renewal of the contract for compliance with Homeland Security Presidential Directive 12. The contract for Personal Identification Verification (PIV) badges, hosting, and maintenance expires and will need to be re-competed.

Federal Goods and Services\$61,435

In FY 2018 the Agency will move into a new facility with another tenant that is not a Federal Government Agency. Armed guard services are required by the Department of Homeland Security – Federal Protective Service (FPS) for a Level III government facility. The increase accounts for potential guard service wage increases, which have been occurring every two years, as well as increases in security requirements due to occupying a building with non-Federal tenants.

Communications Utilities and Postage.....\$37,742

The Communications increase is due to Leased Equipment for processing incoming/outgoing mail in the Agency Mail Center. The Agency anticipates upgrading this equipment due to Pitney Bowes no longer supporting the existing mail meter and receipt/delivery system in FY18. The increase is also due to lease expirations on copy machines that will be disposed of due to consolidation or age. It is estimated that ten machines will be replaced.

Training\$23,134

This increase is due to anticipated Supervisory training programs for First Year Supervisors, Mid-Career Managers and Senior Leaders, due to Office of Personnel Management (OPM) requirements and attrition.

Supplies and Materials.....\$17,660

This increase is for bulk Supplies for the Agency Centralized supply room stock, and includes miscellaneous office supplies that are not regularly stocked but are needed for special projects. The increase also includes a bulk paper contract to supply paper for the entire Agency.

Travel and Transportation\$15,435

This increase is for conducting fieldwork for Commission-approved audits and for travel to attend training.

GSA Rent..... (\$141,120)

The \$141,120 decrease in GSA rent is due to the Agency moving into new leased space. In FY 2018, the FEC will begin a new office lease that represents a reduction in the total amount of space occupied by the Agency.

IT Contracts (\$464,793)

This decrease is due to the Agency realizing cost savings in its IT program resulting from efficiencies in servers and a reduction in the Agency’s overall data center footprint as the Agency migrates systems to a cloud-hosted environment.

Non Capitalized and Capitalized Equipment (\$565,516)

This decrease is related to the Agency realizing the efficiencies of the expenses associated with the website redesign. In partnership with GSA, the FEC has developed an agile, navigable, user-centered online platform to deliver campaign finance information to its diverse base of users.

Status of Two-Year Funds

The Agency requested and was granted two-year funding for Lease Expiration expenses: \$5 million in FY 2016 and \$8 million in FY 2017. The \$5 million have been obligated for Project Management and Technology costs, including design and installation. The \$8 million are scheduled for moving, furniture and construction expenses, including Information Technology and Audio Visual infrastructure. As of January 31, 2018, 50% [Update for 2/12/18] of the \$8 million funds have been obligated.

Table 2 highlights the FY 2019 OMB Budget Request as compared to the President's FY 2018 Budget and the FY 2017 Appropriation and the FY 2017 actual obligations. The FEC's FY 2019 Budget Request is equal to the FEC amount received in the President's FY 2018 Budget. Because of the funding limitation the Agency is decreasing Non-personal by \$923,000 and increasing personnel by the same amount.

Table 2
FY 2019 Budget Request
Object Class Data

Federal Election Commission	FY 2017 Actual Operational Obligations	FY 2018 Operational Budget *	FY 2019 Budget Request	change from FY 2018 to FY 2019	% change from FY 2018 to FY 2019
11 Personnel Compensation	35,529,694	37,104,545	37,820,505	715,960	1.93%
11.52 Cash Awards	508,934	-	-		
12.1 Personnel benefits	11,112,186	11,466,105	11,683,564	217,459	1.90%
12.18 Transit Subsidy	349,780	415,745	405,745	-10,000	-2.41%
Subtotal, Personnel	\$ 47,500,594	\$ 48,986,395	\$ 49,909,814	\$ 923,419	1.89%
21 Travel & transportation of persons	183,397	374,765	390,200	15,435	4.12%
23.1 GSA Rent	5,818,788	5,341,420	5,200,000	-141,420	-2.65%
23.3 Communications, Utilities & Postage	625,053	469,259	507,001	37,742	8.04%
24 Printing & Reproduction	101,613	106,804	106,804	0	0%
25.11 Training, Commercial Fed. & Tuition	335,076	481,051	504,185	23,134	4.81%
25.14 IT Contracts	7,520,179	6,924,793	6,460,000	-464,793	-6.71%
25.2 Contracts & Other Services	811,433	1,239,570	1,332,474	92,904	7.49%
25.3 Federal Goods & Services	1,538,828	1,381,565	1,443,000	61,435	4.45%
26 Supplies and Materials	857,325	1,589,106	1,606,766	17,660	1.11%
31 Non-Capitalized and Capitalized Equipment	5,360,926	4,355,272	3,789,756	-565,516	-12.98%
Subtotal, Non-Personnel	\$ 23,152,618	\$ 22,263,605	\$ 21,340,186	- \$ 923,419	-4.15%
TOTAL	\$ 70,653,212	\$ 71,250,000	\$ 71,250,000	\$ 0	0.00%

* does not include \$8 million of funds set aside for agency move expenses

2B: Appropriations Language

The FEC is including the following Appropriations Language.

FEDERAL ELECTION COMMISSION
Federal Funds
Salaries and Expenses

For necessary expenses to carry out the provisions of the Federal Election Campaign Act of 1971, \$71,250,000, of which not to exceed \$5,000 shall be available for reception and representation expenses.

Section 3: FY 2019 Annual Performance Plan and FY 2017 Annual Performance Report

3A: Introduction

This Annual Performance Plan and Report (APP/APR) is considered the companion to the Federal Election Commission's Strategic Plan for Fiscal Years (FY) 2018-2022, and designed to provide a solid framework for performance planning and reporting in accordance with the requirements of the *GPRA Modernization Act of 2010*.⁹ The FY 2019 Annual Performance Plan and FY 2017 Annual Performance Report are combined in this document to present accomplishments through FY 2017 and performance targets associated with FYs 2017, 2018 and 2019.

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.

⁹ The President's Budget identifies the lower-priority program activities, where applicable, as required under the GPRA Modernization Act, 31 U.S.C. 1115(b)(10). The public can access the volume at: <http://www.whitehouse.gov/omb/budget>.

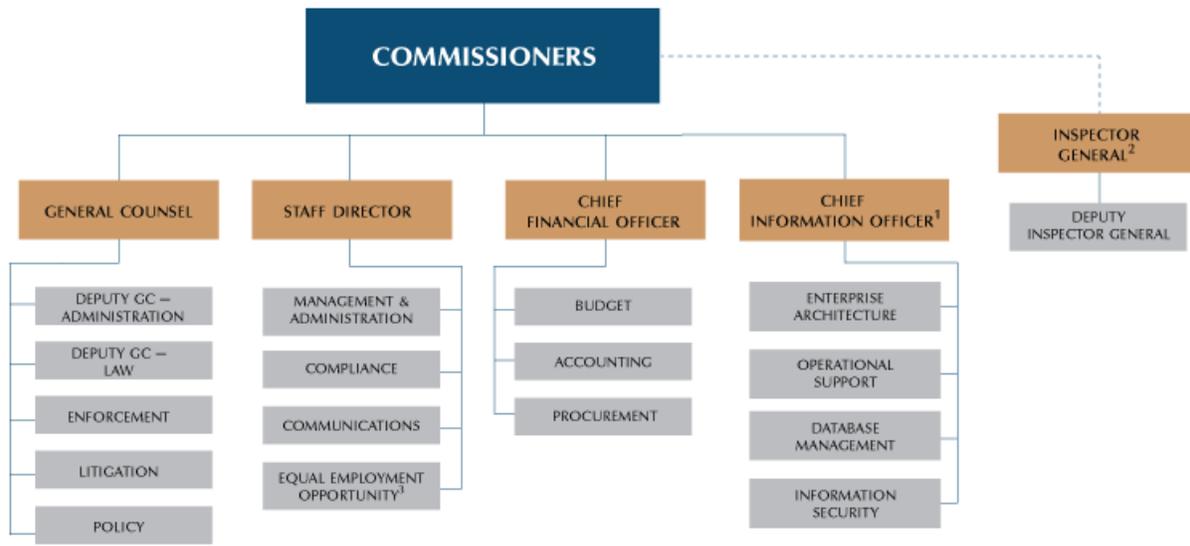
3B: Organizational Structure

The FEC is an independent regulatory Agency responsible for administering, enforcing, defending and interpreting the *Federal Election Campaign Act (the Act)*.¹⁰ 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 the *Act*, 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 www.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 the *Act*, 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 the *Act* 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 Chairmanship of the Commission rotates among the members, with no member serving as Chair more than once during a six-year term. The Commissioners are responsible for administering and enforcing the *Act* and meet regularly to formulate policy and to vote on significant legal and administrative matters. The *Act* requires at least four votes for the Commission to approve official actions, thus requiring bipartisan decision-making. The FEC has its headquarters in Washington, D.C. and does not have any regional offices.

¹⁰ The Commission's primary responsibilities pertain to the *Federal Election Campaign Act of 1971*, Public Law 92-225, 86 Stat. 3 (1972) as amended (*codified at* 52 U.S.C. §§ 30101-30145) (formerly at 2 U.S.C. §§ 431-55) (the *Act* or the *FECA*). The Commission's responsibilities for the Federal public funding programs are contained in the *Presidential Election Campaign Fund Act*, Public Law 92-178, 85 Stat. 562 (1971) (*codified at* 26 U.S.C. §§ 9001-13) and the *Presidential Primary Matching Payment Account Act*, Public Law 93-443, 88 Stat. 1297 (1974) (*codified at* 26 U.S.C. §§ 9031-42).



- 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).

Figure 1: FEC Organizational Chart

As noted in Figure 1 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 immediately 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 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 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 the *Act* 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 administers and ensures compliance with applicable laws, regulations, policies and guidance that prohibit discrimination in the Federal workplace based on race, color, national origin, religion, age, disability, sex, pregnancy, genetic information or retaliation. The EEO Officer reports to the Staff Director on administrative issues, but has direct reporting authority on all EEO matters. See 29 CFR 1614.102(b)(4).

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 the *Act*. 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 data and law and ensures Agency employees have a technology infrastructure that allows them to perform their day-to-day responsibilities administering and enforcing campaign finance law. OCIO also develops and supports analytic reporting tools that help staff perform their disclosure and compliance duties.

Office of the Chief Financial Officer (OCFO)

The Office of the Chief Financial Officer 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 the *Federal Election Campaign Act*, 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

The *Act* 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 the *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 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; Assistant Staff Director for Public Disclosure and Media Relations Division

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 made a number of improvements to modernize its campaign finance disclosure database and public interface. Specifically, the FEC 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. The FEC gauges its effectiveness through a series of indicators designed to measure performance in areas that promote confidence in the campaign finance process, as detailed in the charts below.

Strategies and Next Steps

The FEC's e-filing 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, via the FEC website, 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 electronically on the website and at the FEC's offices in Washington, D.C.¹¹ 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 FEC has implemented an automated data capture process to convert paper-filed reports into structured, machine-readable data. Automating the data capture process decreases data processing time and increases the timeliness in making data available to the public. In addition, the Agency is undertaking a long-term project to convert all remaining microfilm reels of financial reports to images, making this historical campaign finance data easily accessible to the public.

The Commission is also completing the redesign of its website. In partnership with 18F, a data services delivery team within the General Services Administration (GSA), the FEC is developing a user-centered online platform to deliver campaign finance information to its diverse base of users. This effort will ensure that the FEC provides full and meaningful campaign finance data and information in a manner that meets the public's increasing expectations for data customization and ease of use.

Performance measures for assessing progress on this Strategic Objective include measures to ensure that data from campaign finance reports are quickly made available to the public and that the FEC pursues programs to make data more accessible to the public.

Progress Update for FY 2017

The FEC continued its work to receive and make public campaign finance disclosure information. The FEC received 82,136 campaign finance disclosure documents filed during FY 2017 disclosing more than 107.7 million transactions. Reports filed electronically are made available on the FEC website, and may be downloaded by the public within minutes of submission. Reports filed on paper are scanned and made available on the FEC website within 48 hours of receipt. During FY 2017, the FEC ensured that 99 percent of paper filed reports were made available to the public within two business days, just shy of its goal of 100 percent, but met its goal of ensuring that 100 percent of independent expenditure filings were made available to the public within one business day.

¹¹ The Commission's mandatory electronic filing ("e-filing") rules require any committee that receives contributions or makes expenditures in excess of \$50,000 in a calendar year, or that has reason to expect to do so, to submit its reports electronically. Under the Act, these mandatory e-filing provisions apply to any political committee or other person required to file reports, statements or designations with the FEC, except for Senate candidate committees (and certain other persons who support Senate candidates only).

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 95 percent of the reports within 30 days of receipt, and while the FEC has been challenged to meet this goal in recent years, in FY 2017 the Agency exceeded its goal, processing 96 percent of reports within 30 days of receipt.

One significant factor contributing to the Agency's workload in processing and coding reports is the increasing volume of transactions reported in Senate campaign finance disclosure reports. While most filing entities submit their reports electronically, the *FECA* still requires Senate campaign finance disclosure reports to be filed with the Secretary of the Senate, which only accepts paper filed reports. A Senate campaign filing often consists of thousands of pages, and data from these filings consume a disproportionate amount of time to be integrated into the Commission's searchable databases. After these reports are received by the Secretary of the Senate, that office must scan the reports and then deliver them electronically to the FEC. Once the FEC receives a paper report from the Secretary of the Senate, an additional 48 hours can be required to place the report on the Commission's website, and additional time is required to enter the transaction-level data into the database for public consumption. The increasing volume of these reports can delay scanning and delivery to the FEC, and ultimately integration into the FEC's searchable online database.

House candidates have been subject to mandatory electronic filing regulations since 2000, ensuring that these candidates' reports are integrated into the database within a few days of filing. If Senate reports were electronically filed, disclosure will be similarly improved. In addition, the Commission estimates that mandatory electronic filing for Senate reports will yield savings of at least \$898,000 per year in costs directly attributable to the current paper filing system at the FEC, with additional savings at the Secretary of the Senate. Since 2000, the Commission has unanimously recommended to Congress a legislative change to apply mandatory electronic filing rules to Senate reports.

In order to address the difficulty in coding and entering transaction-level data from paper-filed reports and to make the data available to the public sooner, the FEC implemented an automated data capture process to convert paper-filed reports into structured, machine-readable data during FY 2016.

The FEC launched its new, cloud-hosted website in May 2017. The new website, developed in partnership with 18F, provides open, intuitive ways for the public to access and utilize compliance tools and legal resources and to search and download campaign finance information contained in the FEC's cloud-hosted campaign finance database. In addition to improving the public's access to campaign finance data and legal and compliance information, the launch of the new website was an integral step toward meeting the FEC's performance target identified under Objective 4 to reduce its reliance on physical data servers.

During FY 2017, the Commission also published a study of its current eFiling platform, including a survey of the existing functionality of the FEC's free filing software and an in-depth

investigation of needs expressed by filers.¹² The FEC plans to rely on the recommendations of this study to improve its eFiling platform to allow greater operating system flexibility for users when generating filings for submission to the Commission and increase the consistency and accuracy of reporting. The FEC’s new eFiling platform is also expected to improve the process for validating filings prior to acceptance and generate modern file outputs that will provide for more flexibility in accessing data.

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

Key Indicator: Percent of reports processed within 30 days of receipt.								
FY 2012 Actual	FY 2013 Actual	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Target	FY 2017 Actual	FY 2018 Target	FY 2019 Target
94%	88%	79%	92%	100%	95%	96%	95%	95%

¹² Available at <https://fec.gov/about/reports-about-fec/agency-operations/e-filing-study-2016/>.

Supporting Indicators 1-1¹³:

Measure Name	FY 2012 Actual	FY 2013 Actual	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Target	FY 2017 Actual	FY 2018 Target	FY 2019 Target
Percent of reports and statements filed on paper with the FEC made available on the FEC website within two business days of receipt	100%	100%	100%	91% ¹⁴	99%	100%	99%	100%	100%
Percent of 24- and 48-hour reports on independent expenditure spending filed on paper made available on the FEC website within one business day of receipt	N/A	N/A	100%	100%	100%	100%	100%	100%	100%
Implement modernized eFiling system	N/A	N/A	N/A	N/A	N/A	Complete eFiling study	100%	N/A	75% implementation

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

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

Helping the public understand its obligations under the *Act* 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. Progress against these measures and supporting indicators is detailed in the charts below.

Strategies and Next Steps

¹³ A key indicator in the FEC’s previous strategic plan was “Enhanced availability of campaign finance data as measured by increased capabilities to retrieve and analyze data.” Although this key indicator is not included in the FEC’s FY 2018-2022 strategic plan, the Agency set a FY 2017 performance target of 75% for this measure. The actual FY 2017 result was 90%. This compares to prior year results of 81% in FY 2016, 86% in FY 2015 and 75% in FY 2014.

¹⁴ During FY 2015, the Commission developed an automated process to measure this metric in order to provide a more accurate assessment.

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

The FEC's education and outreach programs provide information necessary for compliance with campaign finance law and give the public the context necessary to interpret the campaign finance data filers disclose. The FEC maintains a toll-free line and public email accounts to respond to inquiries regarding campaign finance data disclosed to the public and questions about how to comply with campaign finance law and its reporting requirements. The FEC's Press, Public Records and Congressional Affairs offices also respond to inquiries.

One way the Commission encourages voluntary compliance is by hosting conferences across the country, where Commissioners and staff explain how the *Act* applies to candidates, parties and political action committees. These conferences address recent changes in the law and focus on fundraising, methods of candidate support and reporting regulations.

The FEC also devotes considerable resources to ensuring that staff can provide distance learning opportunities to the general public. The Commission's website is one of the most important sources of instantly accessible information about the *Act*, Commission regulations, and Commission proceedings. In addition to viewing campaign finance data, anyone with Internet access can use the website to track Commission rulemakings, search advisory opinions, audits and closed enforcement matters, view campaign finance data, and find reporting dates. The Commission places a high emphasis on providing educational materials about campaign finance law and its requirements. Toward this end, the FEC has moved its focus away from the printing and manual distribution of its educational materials and instead looked for ways to leverage available technologies to create and disseminate dynamic and up-to-date educational materials through the website. While the Commission continues to make available printed copies of its educational brochures and publications, transitioning to primarily web-based media has allowed the Agency to reduce significantly its printing and mailing costs and use of resources while at the same time encouraging new and expanded ways of communicating with the public via the website.

As part of this broad effort to improve its Internet communications and better serve the educational needs of the public, the Commission maintains its own YouTube channel, which can be found at <http://www.youtube.com/FECTube>. The YouTube channel offers a variety of instructional videos and tutorials that enable users to obtain guidance tailored to their specific activities.

The Agency's educational outreach program has been significantly enhanced with the addition of an online training service that 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 will significantly increase 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.

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 the *Federal Election Campaign Act*, which serves the compelling governmental interest in deterring corruption and the appearance of corruption in financing 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 the *Act*. Commission enforcement actions, which are handled primarily by the Office of General Counsel (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 the *Act*, 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 via the FEC website.

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 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 under the *FECA* in those cases where political committees have failed to meet the threshold requirements for demonstrating substantial compliance with the *Act*, and conducts mandatory audits under the public funding statutes. Subject to limited redactions, threshold requirements approved by the Commission and used by RAD and the Audit Division are public.

The Office of Compliance's Reports Analysis Division (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, audits, 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 Office of Administrative Review (OAR), which are within the Office of Compliance.

The Commission 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 the Federal Election Campaign Act. In addition, the Commission is required by law to audit Presidential campaigns and that accept public funds.

Progress Update for FY 2017

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

During FY 2017, 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 the *Act*. The Commission also continues to strive to better understand and meet the needs of the public and other stakeholders. During FY 2017, the FEC produced a variety of instructional videos and web content, conducted online training workshops and held a comprehensive two-day conference in Chicago, Illinois. The FEC again exceeded its customer service target for conferences and webinars, achieving an average attendee satisfaction rating of 4.43 on a five point scale. The Agency also exceeded its target for providing new online learning presentations to the public.

In another effort to better serve the public, the Agency launched a new feature that allows filers to identify and contact their Campaign Finance Analyst electronically through a web portal on the Agency's website. The new feature, available at <https://www.fec.gov/help-candidates-and-committees/question-rad/>, is part of a larger initiative to create an internal correspondence tracking system to help ensure FEC staff provide timely and consistent answers to inquiries from the public and to streamline the response process.

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

Reports Analysis Division

During FY 2017, RAD continued to ensure that campaigns and political committees file timely and accurate disclosure reports that fully disclose their financial activities. During the fiscal year, RAD reviewed 87,848 documents totaling 34.8 million pages. RAD continued to demonstrate its

commitment to assisting filers with compliance, handling 11,635 phone calls and meetings, developing YouTube reporting tutorials and participating in several FEC conferences, seminars and webinars during FY 2017. In addition, the Reports Processing Branch demonstrated its commitment to providing the public with timely data, coding 28.7 million transactions during FY 2017.

Office of General Counsel

OGC 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 2017, the Commission closed 149 enforcement cases in an average of 15.3 months, which included \$1,189,300 in negotiated civil penalties. The Commission closed 102 cases (68 percent) within 15 months.

Alternative Dispute Resolution

The ADR program continued to promote compliance with Federal campaign finance law and Commission regulations and to reduce the cost of processing complaints by encouraging settlements outside the Agency's normal enforcement track. During FY 2017, the Commission completed 21 ADR cases, which included \$63,055 in negotiated civil penalties. The Commission's performance measure for ADR is to circulate 75 percent of cases to the Commission within 140 days of a case being referred. Seventy-eight percent of cases met the 140-day benchmark.

Administrative Fine Program

The Administrative Fine Program continues to successfully reduce the number of late and non-filed reports and encourage campaign finance transparency through the timely filing of campaign finance reports. During FY 2017, RAD processed 52 reason-to-believe recommendations for Commission consideration. RAD processed 96 percent of these recommendations within 60 days of the original due date of the untimely or not filed report. OAR reviewed 30 challenges submitted by committees in response to a reason-to-believe finding and/or civil money penalty. OAR reviewed 97 percent of these challenges within 60 days of receipt. The average completion time for challenges was 50 days. Overall, OAR has reviewed 747 challenges submitted from the Program's inception through FY 2017.

Audit Division

The Audit Division continues to enforce the *FECA* through an audit process approved by the Commissioners each cycle. During FY 2017, the Audit Division publicly released eight Audit Reports of which two, or 25 percent, were completed within the two-year performance goal period. During FY 2017 there was one challenge to preliminary audit findings under the Request for Legal Consideration by the Commission program established in 2011, and there were four Audit Hearings requested.

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

Key Indicator: Educational outreach programs and events achieve targeted satisfaction rating on user surveys.								
FY 2012 Actual	FY 2013 Actual	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Target	FY 2017 Actual	FY 2018 Target	FY 2019 Target
N/A	N/A	N/A	4.34	4.53	4.0 or higher on a 5.0 scale	4.43	4.0 or higher on a 5.0 scale	4.0 or higher on a 5.0 scale

Supporting Indicators 2-1:

Measure Name	FY 2012 Actual	FY 2013 Actual	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Target	FY 2017 Actual	FY 2018 Target	FY 2019 Target
Increase in the number of E-Learning presentations available on the FEC website	N/A	N/A	13 new trainings	1 new trainings	4 new trainings	4 new trainings	6 new trainings	4 new trainings	4 new trainings
Implement correspondence tracking tool for public-facing offices	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Complete by 2018	N/A

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

Key Indicator: Of the enforcement matters resolved during the fiscal year, the percentage that was resolved within 15 months of the date of receipt.								
FY 2012 Actual	FY 2013 Actual	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Target	FY 2017 Actual	FY 2018 Target	FY 2019 Target
70%	72%	28%	49%	38%	75%	68%	50%	50%

Supporting Indicators 2-2:

Measure Name	FY 2012 Actual	FY 2013 Actual	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Target	FY 2017 Actual	FY 2018 Target	FY 2019 Target
Percent of notifications provided within five days of complaints filed with the FEC	100%	100%	100%	100%	100%	100%	100%	100%	100%
Percent of enforcement matters presented to the Commission for initial review within one year of the date of receipt	N/A	N/A	73%	93%	86%	80%	86%	80%	80%
Percent of RFAIs sent within 40 days of report review	63%	72%	84%	92%	92%	75%	88%	75%	75%
Percent of reports reviewed by RAD within 90 days of receipt	87%	73%	85%	79%	93%	75%	77%	75%	75%
Percent of <i>Proposed Final Audit Reports</i> (PFAR) approved by the Commission within two years from the start of fieldwork	68%	38%	93%	43%	56%	60%	25%	60%	60%
Percent of <i>Reviewing Officer Recommendations</i> circulated within 60 days	90%	93%	100%	97%	82%	75%	97%	75%	75%
Percent of <i>ADRO Recommendations</i> circulated within 140 days of referral	N/A	91%	72%	90%	97%	75%	78%	75%	75%

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

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

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 the *Act* applies to specific situations through the advisory opinion process and represents itself in most litigation before the Federal district court and the courts of appeals. The Commission's three primary means for providing interpretive guidance for the *Act* 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. The *Act* 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, the *Act* 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 the *Act*. The Commission strives to issue these advisory opinions in 30 days.

Defending Challenges to the Act

The Commission represents itself in most litigation before the Federal district court and courts of appeals and before the Supreme Court with respect to cases involving publicly financed Presidential candidates. It also has primary responsibility for defending the *Act* and Commission regulations against court challenges. In addition, the *Act* 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 2017

During FY 2017, the Commission met its goal to provide 100 percent of legal guidance within statutory and court-ordered deadlines. The Commission also met a separate goal to issue 100 percent of advisory opinions within the applicable 60- or 20-day statutory deadlines. During FY 2017, the Commission completed work on 25 AO requests and issued 21 opinions in response to those

requests.¹⁵ Of the 25 AO requests that the Commission completed in FY 2017, 22 were 60-day AORs (six of which received extended deadlines), one was a 20-day AOR, one was a 20-day AOR that received an extended deadline, and one was an AOR that the Commission elected to expedite and issue within 30 days. These AOs addressed a variety of issues, including the affiliation status of membership organizations; the coordinated communications standard; disclaimer requirements for non-connected political committees; state party committee status; and online contribution-processing applications. The average number of days from receipt of a complete AO request to Commission action on it was 43 days for 60-day requests that did not have extended deadlines, and 55 days for all requests.

¹⁵ Four advisory opinion requests resulted in split decisions in which the Commission issued a closeout letter rather than an advisory opinion because the Commission could not approve an advisory opinion by the required number of votes.

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

Key Indicator: Percent of legal guidance provided within statutory and court-ordered deadlines.								
FY 2012 Actual	FY 2013 Actual	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Target	FY 2017 Actual	FY 2018 Target	FY 2019 Target
N/A	N/A	100% ¹⁶	100% ¹⁷	100% ¹⁸	100%	100% ¹⁹	100%	100%

¹⁶ The Commission obtained extensions to consider ten advisory opinion requests in FY 2014; four of those extensions were attributable to the Federal government shutdown during October 2013. The Commission did not have any rulemakings during FY 2014 with statutory or court-ordered deadlines.

¹⁷ The Commission obtained extensions to consider two advisory opinion requests in FY 2015. The Commission did not have any rulemakings during FY 2015 with statutory or court-ordered deadlines.

¹⁸ The Commission obtained extensions to consider six advisory opinion requests in FY 2016.

¹⁹ The Commission obtained extensions to consider seven advisory opinion requests in FY 2017.

Supporting Indicators 3-1²⁰:

Measure Name	FY 2012 Actual	FY 2013 Actual	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Target	FY 2017 Actual	FY 2018 Target	FY 2019 Target
Percent of advisory opinions issued within 60-day and 20-day statutory deadlines	100% ²¹	100% ²²	100% ²³	100% ²⁴	100% ²⁵	100%	100% ²⁶	100%	100%
Percent of court filings that meet all deadlines and rules imposed by the courts	97%	100%	100%	100%	100%	100%	98%	100%	100%

²⁰ The Commission set as a FY 2017 performance target to revise 100% of reporting forms within 90 days of approval of regulations that require conforming changes to forms. The Commission did not complete any rulemakings during FY 2017 that required conforming changes to forms.

²¹ Three 60-day advisory opinions and two 20-day advisory opinions had extended deadlines.

²² Four 60-day advisory opinions had extended deadlines.

²³ The Commission obtained extensions to consider ten advisory opinions during FY 2014; four of those extensions were attributable to the Federal government shutdown during October 2013.

²⁴ The Commission obtained extensions to consider two advisory opinion requests in FY 2015.

²⁵ The Commission obtained extensions to consider six advisory opinion requests in FY 2016.

²⁶ The Commission obtained extensions to consider seven advisory opinion requests in FY 2017.

3C:2.4 Strategic Objective 4: Foster a Culture of High 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 2018-2022, Foster a Culture of High 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. Supporting targets and results are detailed in the charts below.

Strategies and Next Steps

The Commission understands that the success of its programs depends upon the skills and commitment of its staff. The Commission is focused on ensuring that staff training needs are assessed and met at every level of the Agency and that Agency leaders receive training necessary to help manage and maintain a fully engaged and productive workforce. The FEC's Office of Human Resources (OHR) is also focused on decreasing the time to hire, improving the Agency's performance management systems and developing a supervisory and managerial training program for senior leaders, mid-career managers and first time supervisors. As discussed in section 3:D:1, below, the FEC also took steps during FY 2017 to improve employee morale.

Consistent with its commitment to fostering the talents and skills of its employees and providing excellent service to the public, the FEC will create a cross-functional group within the Agency to develop and implement user-centered, evidence-based design solutions for achieving the Agency's mission efficiently and effectively. The team will leverage technological advancements to improve the delivery of mission critical functions. This team will be tasked with harnessing the creativity and ideas of Agency employees, and emerging technologies, to restructure systems, tools and processes, while building a 21st century IT infrastructure to better serve the American public.

The FEC is also participating in and contributing to the government-wide Records Management initiative. In compliance with the *Federal Records Act*, the FEC is updating its records management program. The updated program will increase efficiency and improve performance by eliminating paper and using electronic recordkeeping to the fullest extent possible. During FYs 2017 and 2018, the FEC will continue its efforts to preserve and disclose Agency activities and decisions by modernizing the Commission's records management policies and procedures and implementing a training process regarding those modernized policies and procedures.

Progress Update for FY 2017

In addition to assessing the Agency's progress in fostering a workforce that delivers results by ensuring that internal performance targets are met, the Commission tracks the Agency's efforts to improve the effectiveness and efficiency of its operations.

The Commission’s records management program made significant advancements in calendar year 2017. In November 2017, the Commission identified its Agency Capstone Officials and approved its Agency-wide Email Management Policy, in accordance with the Managing Government Records Presidential Directive. With this approval, the Commission now seeks approval from the U.S. National Archives and Records Administration (NARA) of NARA form 1005 (NA-1005) *Verification for Implementing GRS 6.1*, upon which the Email Management Policy may be formally implemented. In addition, following the July 2017 request, in October 2017 the Commission received approval from the Archivist of the United States to maintain electronically its most voluminous series of records: Federal Campaign Finance Reports and Filings. This approval represents significant progress toward the 2019 Presidential Directive of managing all permanent electronic records in an electronic format.

Fiscal Years 2018 and 2019 will continue to focus on managing permanent and temporary records electronically and scheduling unscheduled records, with two such record schedule requests currently pending with NARA for approval. Additionally, of significant import will be the effort to update the Agency’s records schedules and train all Agency staff on the modernized records management policies, procedures, and responsibilities.

In conjunction with the redesign of the Agency’s website, described under Objective 1, the FEC has also begun the process of migrating appropriate data and systems, such as the campaign finance database, to a cloud environment. Cloud hosting offers a number of benefits for the FEC in particular. The Agency’s Internet traffic is variable, with many more visitors accessing the website during election years and near reporting deadlines. In addition to website visitors, filers need to access the electronic filing system and Commission staff need to access applications, including the website and databases, to perform their day-to-day duties. With a cloud-hosted application and database infrastructure, the FEC will only need to pay for the actual usage, rather than constantly maintaining the capacity to support peak usage, even during periods of reduced usage. Website downtime will be minimized and server maintenance will be managed by the cloud computing provider. During FY 2017, the FEC set a baseline for the number of physical data centers it maintains, and set a target to reduce this number by 25 percent in FY 2018.

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

Key Indicator: Commission-required quarterly updates meet targeted performance goals.								
FY 2012 Actual	FY 2013 Actual	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Target	FY 2017 Actual	FY 2018 Target	FY 2019 Target
N/A	N/A	73%	80%	76%	65%	85%	65%	65%

Supporting Indicators 4-1²⁷:

Measure Name	FY 2012 Actual	FY 2013 Actual	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Target	FY 2017 Actual	FY 2018 Target	FY 2019 Target
Average number of days to hire	N/A	N/A	N/A	N/A	N/A	N/A	N/A	80 days	80 days
Implement new performance management system	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Non-bargaining unit implementation
Develop program for tiered supervisory training	N/A	N/A	N/A	N/A	N/A	Establish Framework	100%	Launch Senior Leader program	Launch mid-career manager program
Meet Records Management Presidential Directive milestones	N/A	100%	50%	N/A ²⁸	60%	As specified in Presidential Directive	70%	As specified in Presidential Directive	As specified in Presidential Directive
Reduce reliance on physical data centers	N/A	N/A	N/A	N/A	N/A	Baseline of four physical data centers	N/A	25% reduction from baseline	25% reduction from baseline

²⁷ Three additional supporting indicators tied to the FEC's previous strategic plan had performance targets for FY 2017. Reducing turnover of high performing employees was assigned a FY 2017 a target of 3%. The FY 2017 actual result was 8%, compared to 8% in FY 2016, 1% in FY 2015 and 3% in FY 2014. The Commission set a target of 99% for the percent of eligible employees who receive an annual performance evaluation each performance period. The FY 2017 actual result was 85%, compared to 82% in FY 2016, 61% in FY 2015 and 100% in FY 2014. The Commission set a target to achieve 100% of Agency IT initiatives within a 15% variance of approved budgets in FY 2017. The FY 2017 actual result was 100%, the same result achieved in FYs 2016, 2015 and 2014.

²⁸ There were no Records Management Presidential Directive milestones for calendar year 2015.

Develop and implement Innovation Center	N/A	Complete by 2019							
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3D: Implementation Factors

3D:1 Major Management Priorities, Challenges and Risks

The FEC identified in the Agency’s FY 2018-2022 Strategic Plan a management objective, Foster a Culture of High Performance, that sets out strategies and measures designed to help the Agency deliver greater impact through innovation, increase effectiveness and efficiency, and improve service. Detailed information about this Strategic Objective is available in section 3C:2.4, above. In addition, the Commission has identified management initiatives as strategic activities in the strategic plan to support its mission objectives where those activities are deemed crucial to the success of the objective.

During FY 2017, the FEC worked in collaboration with the 18F team from GSA to redesign the FEC website to ensure that the FEC provides campaign finance disclosure information in a manner that is most beneficial to the public. 18F relies on an agile development model, where new products are quickly developed in their simplest forms and put before users immediately in order to test the developers’ assumptions. This evidence-based development model allows user experience and feedback to drive the development process and ensures that the FEC can provide improved services to the public as they become available over time, rather than having to wait until the entire project is completed. The website redesign project is further detailed in section 3C:2.1.

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 October 20, 2017, the IG identified one challenge facing management: governance and management framework. The IG’s assessment and the FEC’s response are included in the FEC’s FY 2017 Agency Financial Report, available on the FEC website at <https://www.fec.gov/resources/cms-content/documents/FY2017.FEC.AgencyFinancialReportAFR.pdf>.

3D:2 Data Validation and Verification

OMB Circular A-136, as revised, and the *GPR 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 data validation and verification (V&V) 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 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. Campaign finance reports and statements filed electronically are made available on the FEC website nearly instantaneously, and reports and statements filed on paper with the FEC are placed on the FEC website within 48-hours of receipt. In addition, 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 95 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 2018 and 2019 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.

Section 4: Federal Election Commission Agency Reform Plan

The FEC is an independent regulatory agency responsible for administering, enforcing, defending and interpreting the *Federal Election Campaign Act (FECA or the Act)*.²⁹ 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.

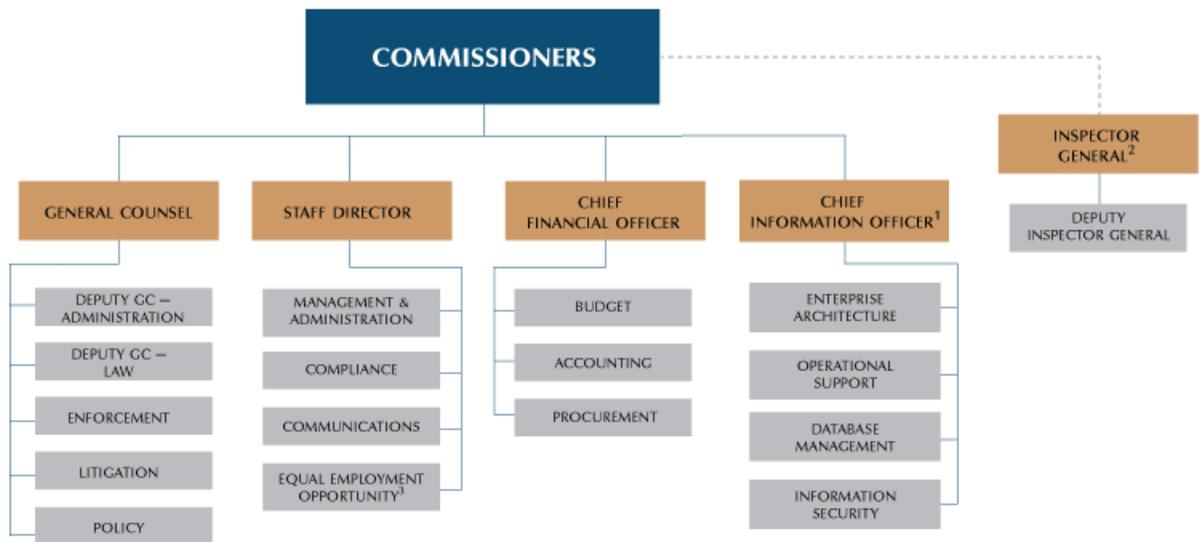
Under the *FECA*, all federal political committees, including the committees of Presidential, Senate and House candidates, must file reports of receipts and disbursements. The FEC makes disclosure reports available to the public through the Commission's Internet-based public disclosure system at www.fec.gov 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 the *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 the *FECA* and issues advisory opinions responding to inquiries.

In compliance with Executive Order 13781 "Comprehensive Plan for Reorganizing the Executive Branch" and the "Hiring Freeze" Presidential Memorandum, as implemented under OMB Memorandum M-17-22, the FEC has developed the following agency Reform Plan to ensure the agency meets its mission requirements efficiently and effectively over the next several years, with a high level of accountability to the American public. The elements of this plan, as detailed below, were developed by a committee of senior managers, in consultation with staff throughout the agency. Instances where elements of this plan were additionally informed by public comments are noted below. This plan should be read in conjunction with the FEC Strategic Plan, FY 2018-2022 and FY 2019 Congressional Budget Justification.

²⁹ The Commission's primary responsibilities pertain to the *Federal Election Campaign Act of 1971*, Public Law 92-225, 86 Stat. 3 (1972) as amended (*codified at 52 U.S.C. §§ 30101-30145*) (the *Act* or the *FECA*). The Commission's responsibilities for the federal public funding programs are contained in the *Presidential Election Campaign Fund Act*, Public Law 92-178, 85 Stat. 562 (1971) (*codified at 26 U.S.C. §§ 9001-13*) and the *Presidential Primary Matching Payment Account Act*, Public Law 93-443, 88 Stat. 1297 (1974) (*codified at 26 U.S.C. §§ 9031-42*).

Long-Term Workforce Plans

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. The Commissioners are responsible for administering and enforcing the *FECA* and Commission regulations and meet regularly to formulate policy and to vote on significant legal and administrative matters. The *FECA* requires at least four affirmative votes for the Commission to approve official actions, thus requiring bipartisan decision-making.



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).

Figure 1: FEC Organizational Chart

As noted in Figure 1 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 immediately 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 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 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 the *Act* through educational outreach and training, and ensuring effective communication with Congress, executive branch agencies, the media and researchers, and the general public. The Equal Employment Opportunity Office (EEO) administers and ensures compliance with applicable laws, regulations, policies and guidance that prohibit discrimination in the federal workplace based on race, color, national origin, religion, age, disability, sex, pregnancy, genetic information or retaliation. The EEO Officer reports to the Staff Director on administrative issues, but has direct reporting authority on all EEO matters. See 29 CFR 1614.102(b)(4).

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 the *Act*. 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 data and law and ensures agency employees have a technology infrastructure that allows them to perform their day-to-day responsibilities administering and enforcing campaign finance law. OCIO also develops and supports analytic reporting tools that help staff perform their disclosure and compliance duties.

Office of the Chief Financial Officer (OCFO)

The Office of the Chief Financial Officer is responsible for complying with all financial management laws and standards, and all aspects of budget formulation, budget execution and procurement.

The Commission continues to take steps to ensure the FEC's staff is appropriately sized. Roughly a quarter of FEC employees will become eligible for retirement by the end of FY 2019. While this high level of projected employee turnover represents a potential risk to the agency's operations, it also provides opportunities to reshape the agency's workforce.

Since the FEC opened its doors in 1975, the funding of federal elections has evolved dramatically, in part as a result of technological innovations. The Commission prides itself on past efforts to improve and change the way the agency operates—from the development of the FEC's state-of-the-art campaign finance database and website to recent efforts to streamline and provide more transparency in its enforcement and compliance programs. The Commission always strives to spend taxpayer dollars prudently and will continue to seek greater efficiencies in its operations. The FEC has already begun the work of analyzing and modernizing position descriptions to reflect the changing needs of the agency. Across all areas, the FEC will seek to use technology to automate tasks where possible. Within information technology areas, the agency will seek to employ staff with broader technical skillsets to increase the agility of its workforce.

In addition to these efforts, the Commission is focused on efforts to improve the performance and accountability of staff. The Commission has included as a management objective in its FY 2018-2022 Strategic Plan to Foster a Culture of High Performance. The agency will measure its success in meeting this goal by the percentage of internal program performance goals met. For FY 2019, the FEC has set a target of meeting 65% of targeted performance goals as reported quarterly to the Commission.

Another performance measure in the FY 2019 Annual Performance Report sets milestones for the implementation of a new performance management system. In February 2017, the agency launched a study to revise its workforce performance process, program and policies. The central goal of this effort is to create a simple, fair and transparent method of evaluating employee performance against critical elements and mission requirements and providing timely and effective feedback. Based on the results of this study, the FEC will update and improve its formal human capital policies and procedures to maximize employee performance.

Other performance targets identified in the FEC's FY 2019 Annual Performance Plan track the

success of the FEC's efforts to reduce average days to hire and to develop targeted training programs for supervisors, including Senior Leaders, mid-career managers and new supervisors. Implementing this tiered managerial training plan and the FEC's new performance management system will improve the performance and accountability of FEC staff.

These projects will be accomplished through administrative means with no known impact on other agencies.

Reform Plan

Workforce Management

Pooling mission support staff. For some years, the FEC has made do with less in terms of paralegal and administrative support staff as the ranks of these positions have been thinned by attrition. Paralegal and administrative support has been pooled within divisions as staff have become more self-sufficient for administrative needs, partly as a result of technology. To improve office-wide efficiency, the FEC will extend its program to pool paralegal and administrative staff, as appropriate, and to cross-train staff in the different specialized skills needed by different divisions throughout the agency.

The FEC anticipates that continued, incremental efforts to pool paralegal and administrative support positions will result in long-term cost avoidance and free FTE to focus on mission-related functions. This program will be enacted through administrative steps taken by the agency to review and update position descriptions as necessary. The FEC continues to assess ways in which technology has changed or eliminated the need for some positions and will build in flexibility to adapt to ongoing technological advances. The FEC will measure its success in accomplishing this workforce management goal by achieving its targets for cross training and cross assignment of staff. The FEC will set a baseline for cross-training and cross-assignment activities during FY 2018 and set appropriate targets in FY 2019.

Improvements in Efficiency and Effectiveness

Beginning in FY 2018 and continuing through FY 2022, the FEC will implement a suite of programs to improve the efficiency and effectiveness of its operations by better leveraging technology and improving underlying business processes, redesigning processes to serve the public more effectively and leveraging existing solutions for common requirements.

Reducing physical footprint. The FEC has taken bold steps to reduce its overhead costs over the next ten years and beyond. In fiscal year 2018, the Commission will move from 999 E Street, NW. to 1050 First Street, NE. The new space, which the FEC anticipates occupying during the first calendar quarter of 2018, will represent a 26% reduction in the total square footage used by the agency. The new lease is for a fifteen-year period with a start date of October 1, 2017, and the FEC anticipates this change will result in a \$582,459 decrease in GSA rent during FY 2018 alone, which includes savings attributable to the reduction in the total amount of space occupied by the agency and also reflects a one-time savings from favorable rent credits. For FY 2019, the FEC anticipates a \$141,000 reduction in rent from the agency's FY 2018 expenses. To cover expenses related to the FEC's office space move, the Commission received appropriations of two-year funds: \$5 million in FY 2016 and \$8 million in FY 2017.

Beyond reducing overall costs for office space, moving to the new office location is expected to reduce attendant costs and provide opportunities for efficiencies. The new building, never before occupied, will be substantially more energy efficient and environmentally friendly than the Commission's currently leased building, which was constructed in the 1930s. This combination will lead to reduced rent and utilities costs over the long term. Moreover, the reduction in office space has prompted the agency to take further steps to reduce its reliance on the physical storage

of paper or microfilm based information, as discussed below, and to better group physical offices within the agency to maximize communication and office efficiency.

The FEC has set a target of completing the move to the new office space during the first quarter of calendar year 2018.

Digitizing microfilm holdings. The FEC continues to take incremental steps to reduce its physical storage requirements and to improve the accessibility of information to the public. During FY 2018, Public Disclosure and Media Relations Division staff will complete the scanning of more than 2,000 reels of microfilm, representing approximately 10 million pages of historical campaign finance reports that are not currently available on the FEC website. Digitizing the agency's microfilm holdings will result in greater access to FEC records by the public and reduce the cost associated with the agency's move to a new headquarters by eliminating the physical storage of microfilm reels and machines. This project will be completed administratively by the FEC. In addition to greatly improving the transparency of this information, which will for the first time be made readily available to the public electronically, digitizing the FEC's microfilm holdings will contribute to the annual GSA lease savings discussed above. The FEC has set as a performance target completing this digitization project during the first quarter of calendar year 2018.

Leverage technology. At the same time, the FEC is taking incremental steps to better leverage technology to improve efficiency and effectiveness. The agency will accomplish this goal during FY 2018 by acquiring new FOIA software to reduce response times and improve productivity. The agency will also work over the next several years to expand steps already taken to automate workflows and eliminate paper. Workflow automation improves efficiency by eliminating the time required to print and route documents manually. It also automatically notifies the next reviewers of a draft that a document awaits their attention and allows the reviewers to revise, edit, annotate and return documents electronically. It lowers costs by reducing the use of paper, toner, computer support for printing peripherals and reducing physical storage needs. When the FEC moves staff to the agency's new headquarters, it will rely on more cost- and space-effective data storage methods. The agency will implement this program through administrative means and has set as a performance target to implement new FOIA software during FY 2018.

Implement pay.gov. The FEC is also implementing an incremental program to shift to alternative delivery models. Two of the FEC's enforcement programs, Administrative Fines and Alternative Dispute Resolution, currently allow respondents to pay civil penalties online using pay.gov, which streamlines the process for respondents and reduces the burden on FEC staff. Pay.gov lets individuals, states and business make non-tax related payments to the federal government using the internet. Payments can be made to federal agencies using a U.S.-held bank account, a credit or debit card or with a digital wallet, such as PayPal or Dwolla. For federal agencies, pay.gov provides a full suite of services allowing agencies to find and process collections quickly and easily. Expanding this payment option to other FEC enforcement programs will further increase the benefits to respondents and improve the efficiency of FEC staff. The Commission has set as a performance target for this initiative to implement pay.gov for enforcement programs during FY 2018.

Migrate campaign finance database to a cloud environment. The FEC is implementing a bold plan to reduce reliance on physical servers and migrate the FEC website and campaign finance

database to a cloud environment. The FEC is developing an agile, navigable, user-based website to deliver campaign finance information to its diverse base of users. The FEC provides the public with a wealth of complex information, including current and historical campaign finance data, detailed information regarding the requirements of the campaign finance law and legal resources such as advisory opinions issued by the Commission and information on closed enforcement matters. The redesigned website provides open, intuitive ways for the public to access and utilize information such as campaign finance data, compliance tools and legal resources.

In conjunction with the redesign of the agency's website, the FEC has begun the process of migrating appropriate data and systems, such as the campaign finance database, to a cloud environment. Cloud hosting offers a number of benefits for the FEC in particular. The agency's Internet traffic is variable, with many more visitors accessing the website during election years and near reporting deadlines. In addition to website visitors, filers need to access the electronic filing system and Commission staff need to access applications, including the website and databases, to perform their day-to-day duties. With a cloud-hosted application and database infrastructure, the FEC will only need to pay for the actual usage, rather than constantly maintaining the capacity to support peak usage, even during periods of reduced usage. Website downtime will be minimized and server maintenance will be managed by the cloud computing provider.

The FEC began work to migrate the campaign finance database, which is the agency's largest database, to a cloud environment during FY 2015, and launched its new website, which relies entirely on this cloud hosted model, in May 2017. In addition, the FEC completed a Cloud Study during FY 2017 to develop a road map for migrating other applicable databases, systems and applications to a cloud environment. The agency has set as a performance goal in its FY 2019 Annual Performance Plan to reduce the agency's reliance on physical data centers over the next four years. For phase one of this reduction, the FEC has set a target of reducing physical data centers during FY 2018 by 25% from the FY 2017 baseline of four physical data centers. The FEC estimates shutting down the physical data center that currently hosts the campaign finance database and website will result in \$1 million in cost avoidance during the first full year of implementation.

Modernize the FEC's eFiling system. The FEC will also begin work on a bold plan to modernize the agency's eFiling system during FY 2018. 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, via the FEC website, within minutes of being filed. During FY 2017, the Commission published a study of its current eFiling platform, including a survey of the existing functionality of the FEC's free filing software and an in-depth investigation of needs expressed by filers.³⁰ Based on the recommendations revealed through this evidence-based study, the FEC plans to improve its eFiling platform to allow greater operating system flexibility for users when generating filings for submission to the Commission. Improvements to the eFiling platform will also increase the consistency and accuracy of reporting. The FEC's new eFiling platform is also expected to improve the process for validating filings prior to acceptance

³⁰

Available at <https://fec.gov/about/reports-about-fec/agency-operations/e-filing-study-2016/>.

and generate modern file outputs that will provide for more flexibility in accessing data.

The modernization efforts will provide for seamless integration with the website. The FEC's modernized eFiling platform, which will be hosted in a cloud environment, will be administered by existing FEC staff, reducing the number of contractors needed to support this system. The Commission has identified as a performance target in the FY 2019 Annual Performance Plan completing 75% of the eFiling modernization implementation during FY 2019.

Reducing reliance on legacy systems. In addition to the large-scale initiatives to migrate the campaign finance database to a cloud environment and modernize the FEC's eFiling system, the FEC will begin work to incrementally reduce reliance on legacy systems. Moving to a cloud-hosted model provides the Commission opportunities to continue to reduce its dependency on costly legacy systems, including mission-critical systems affecting both internal and external users, consistent with the recommendations of the Government Accountability Office's May 2016 report, *Federal Agencies Need to Address Aging Legacy Systems*. For example, planned improvements to the eFiling system, which was designed in the mid-1990s, will provide an opportunity to migrate the eFiling data center to a cloud environment, reducing costs for the support and maintenance of the legacy eFiling physical data center. In addition to reducing the FEC's dependence on physical servers, retiring such legacy systems and migrating to a cloud environment will allow the FEC to automate certain tasks currently performed manually, thus reducing the long-term staffing costs associated with maintaining legacy systems.

This initiative will be accomplished administratively over the next several years and will include efforts to modernize and improve the internal systems that support the eFiling system and the Reports Analysis Division's review process. These efforts depend in part on the success of other initiatives, such as the implementation of the recommendations of the Cloud Study and evidence received from the results of usability testing of the FEC's online disclosure systems. The Commission has identified as a performance target in the FY 2019 Annual Performance Plan completing 75% of the eFiling modernization implementation during FY 2019. Full implementation of the new eFiling system will remove the need to continue to improve and support the legacy eFiling system.

Legislative recommendations. Improvements in the efficiency and effectiveness of FEC operations can also be achieved through legislative changes. On December 14, 2017, the Commission submitted legislative recommendations to Congress.³¹ Three of these recommendations represent bold proposals to streamline processes for disclosing campaign finance data to the public and ensure that the agency can provide more timely disclosure of reported campaign finance data 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 and the Administration. The FEC has set as a performance target to consider legislative recommendations during calendar year 2018.

Electronic Filing of Senate Reports

Sections: 52 U.S.C. § 30102(g)

³¹ <https://www.fec.gov/resources/cms-content/documents/legrec2017.pdf>

Recommendation: Congress should require electronic filing for all Senate candidates and their authorized committees (and for those persons and political committees filing designations, statements, reports or notifications pertaining only to Senate elections) if they have, or have reason to expect to have, aggregate contributions or expenditures in excess of the threshold amount determined by the Commission.

Explanation: The Treasury and General Government Appropriations Act, 2000, Pub. L. No. 106-58, § 639, 113 Stat. 430, 476 (1999), 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). However, because Senate candidates file with the Secretary of the Senate, the mandatory electronic filing provisions do not apply to Senate candidates and their committees.

Reports that are filed electronically must be submitted by the due date and are normally available to the public, and may be downloaded, within minutes. In contrast, reports that are filed on paper must be postmarked by the due date. Once the report is delivered to the Secretary of the Senate and then transmitted to the Federal Election Commission, the time between the Commission's receipt of a report filed through the paper filing system and its initial appearance on the Commission's web site is 48 hours. Moreover, a Senate campaign filing often consists of thousands of pages, and data from a vast majority of filings take five to ten days to be integrated into the Commission's searchable databases. If such reports were electronically filed, the data could be made available to the public in most cases within minutes. Electronic filings are also not subject to delay due to post office processing or disruptions in the delivery of mail, such as those arising from security measures put in place after the discovery of anthrax powder and ricin in mail.

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 resources. In fact, the Commission estimates at least \$898,000 per year in costs directly attributable to current Senate filing procedures would be saved by requiring electronic filing. In addition to these savings for the Commission, the Secretary of the Senate would also realize savings, and committees that file reports could substantially reduce their processing costs.

Increases in the volume of Senate paper filings in the 2018 election are posing a challenge to paper handling capacities of the Federal Election Commission and the Secretary of the Senate. For example, the number of Senate paper report pages filed for the 2018 election cycle as of November 30, 2017, was 415,012, exceeding the number filed for the 2016 election cycle at the comparable point in the election cycle by 59%. This is a substantial increase from 2016, which was also a record-setting election cycle. The increasingly high volume of paper reports has caused delays in providing these reports to the public and makes the need to institute electronic filing urgent.

Electronic Filing of Electioneering Communication Reports

Section: 52 U.S.C. § 30104(a)(11)(A)(i)

Recommendation: Congress should require reports of electioneering communications to be filed electronically with the Commission, rather than on paper.

Explanation: The Treasury and General Government Appropriations Act, 2000, Pub. L. No. 106-58, § 639, 113 Stat. 430, 476 (1999), 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 52 U.S.C. § 30104(a)(11)(A)(i). However, because electioneering communication reports are not filed by political committees, and because funds spent for electioneering communications are reported as “disbursements,” and not as “expenditures,” the mandatory electronic filing provisions do not apply to electioneering communication reports.

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 resources. Reports that are filed electronically are normally available to the public, and may be downloaded, within minutes. In contrast, the time between the receipt of a report filed through the paper filing system and its initial appearance on the Commission’s web site is 48 hours.

Electronic filings are not subject to delay due to post office processing or disruptions in the delivery of mail, such as those arising from security measures put in place after the discovery of anthrax powder and ricin in mail. Because of these security measures, the Commission’s receipt of mailed paper filings is delayed. In contrast, electronic filings are not subject to these delays.

Only entities that report more than \$50,000 of electioneering communications would be subject to mandatory electronic filing under the proposal. The current threshold selected by the Commission ensures that entities with limited financial resources can file reports on paper, which avoids the limited cost of internet access and a computer sufficient to file reports.

Increase and Index for Inflation Registration and Reporting Thresholds

Sections: 52 U.S.C. §§ 30101, 30104 and 30116

Recommendation: Congress should increase and index for inflation certain registration and reporting thresholds in the Federal Election Campaign Act that have not been changed since the 1970s.

Explanation: Most of the Federal Election Campaign Act’s contribution limits and registration and reporting thresholds were set in the 1970s. Because over twenty years of inflation had effectively reduced FECA’s contribution limits in real dollars, the Bipartisan Campaign Reform Act of 2002 increased most of the Act’s contribution limits to adjust for some of the effects of inflation. Furthermore, BCRA indexed these limits for inflation to address inflation in future. 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. 52 U.S.C. § 30101(4)(A). 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. 52 U.S.C. § 30101(4)(C). The Commission recommends that Congress increase these thresholds to amounts determined appropriate by Congress, 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. 52 U.S.C. § 30104(c)(1). The Commission recommends that Congress increase this threshold to an amount determined by Congress and index this amount for inflation.

Increasing these thresholds would take into account many years of inflation and the general increase in campaign cost and ease the compliance burdens on smaller organizations and individuals. Additionally, by increasing the thresholds, Congress would exempt some individuals and small organizations that engage in only minimal spending from the Act'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.

Opportunities to Restructure and Merge Activities

The Commission has identified opportunities to restructure and merge certain activities to improve the efficiency, timeliness and quality of services, improve organizational decision making and improve coordination and information sharing across existing silos.

Developing an Innovation Center. Consistent with its commitment to fostering the talents and skills of its employees and providing excellent service to the public, the Commission has developed a bold plan to create a cross-functional group within the agency to develop and implement user-centered, evidence-based design solutions for achieving the agency's mission efficiently and effectively. The team will leverage technological advancements to improve the delivery of mission critical functions. This team will improve organizational decision making and be tasked with harnessing the creativity and ideas of agency employees, and emerging technologies, to restructure systems, tools and processes, while building a 21st century IT infrastructure to better serve the American public.

During FY 2018, the agency will conduct a study of successful innovation centers, both inside and outside of government, and develop an implementation plan and metrics for program success. The Commission has set as a performance measure in the FY 2019 Annual Performance Plan to implement an Innovation Center within the agency during FY 2019.

Implementing a correspondence tracking tool. The FEC will also improve the efficiency, timeliness and quality of customer service through an incremental program to create an internal correspondence tracking system to help ensure FEC staff provide timely and consistent answers to inquiries from the public and to streamline the response process. This system will allow filers and the public to quickly identify and query appropriate FEC staff. In addition to ensuring prompt responses to public inquiries, this tool will allow staff to communicate responses among offices, thus improving staff efficiency.

Public feedback gathered by the Reports Analysis Division suggests that political committees that file with the Commission want and expect to be able to contact Campaign Finance Analysts via email. The FEC implemented this functionality for Campaign Finance Analysts during FY 2017. The Commission has set as a performance measure in the FY 2019 Annual Performance Plan to complete implementation for participating offices during FY 2018.

Office of Inspector General's Fiscal Year 2019 Budget Request

The Inspector General Reform Act (Pub. L. 110-409) was signed by the President on October 14, 2008. Section 6(f)(1) of the Inspector General Act of 1978, 5 U.S.C. app., was amended to require certain specifications concerning Office of Inspector General (OIG) budget submissions each fiscal year.

Each Inspector General (IG) is required to transmit a budget request to the head of the establishment or designated Federal entity to which the IG reports specifying:

- the aggregate amount of funds requested for the operations of the OIG;
- the portion of this amount requested for OIG training, including a certification from the IG 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).

The head of each establishment or designated Federal entity, in transmitting a proposed budget to the President for approval, shall include:

- an aggregate request for the OIG;
- the portion of this aggregate request for OIG training;
- the portion of this aggregate request for support of the CIGIE; and
- any comments of the affected IG with respect to the proposal.

The President shall include in each budget of the U.S. Government submitted to Congress:

- a separate statement of the budget estimate submitted by each IG;
- the amount requested by the President for each OIG;
- the amount requested by the President for training of OIGs;
- the amount requested by the President for support of the CIGIE; and
- any comments of the affected IG with respect to the proposal if the IG concludes that the budget submitted by the President would substantially inhibit the IG from performing the duties of the OIG.

Following the requirements as specified above, the OIG of the Federal Election Commission submits the following information relating to the OIG's requested budget for fiscal year 2019:

- the aggregate budget request for the operations of the OIG is \$1,585,597;
- the portion of this amount needed for OIG training is \$32,000; and
- the portion of this amount needed to support the CIGIE is an estimated \$4,217.

I, J. Cameron Thurber, certify as the Deputy IG of the Federal Election Commission that the amount I have requested for training satisfies all OIG training needs for fiscal year 2019.