Federal Election Commission

Office *of the* Inspector General

Management and Performance Challenges Facing the FEC for FY 2026

December 15, 2025

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Introduction and Approach

Why do we publish this report?

In accordance with the Reports Consolidation Act of 2000, the Federal Election Commission (FEC or Commission) Office of the Inspector General (OIG) identifies the most serious management and performance challenges facing the Commission and provides a brief assessment of the Commission's progress in addressing those challenges. By statute, this report is required to be included in the FEC's Agency Financial Report.

What are management challenges?

The Government Performance and Results Modernization Act of 2010 identifies major management challenges as programs or management functions that are vulnerable to waste, fraud, abuse, and mismanagement, and where a failure to perform well could seriously affect the ability of the agency to achieve its mission objectives. Each challenge area is related to the agency's mission and reflects both continuing vulnerabilities and emerging issues. The FEC OIG identified the top management and performance challenges facing the Commission as the following:

- Loss of Quorum and Loss of Bipartisan Membership
- Resource Management
- Modernization of Information Systems and Cybersecurity
- Growth of Election Contributions
- Outdated Statutory Pay Structure

How did we identify these challenges?

We identified the Commission's major management and performance challenges by recognizing and assessing key themes from OIG audits, special reviews, hotline complaints, investigations, and an internal risk assessment, as well as reports published by external oversight bodies, such as the Office of Personnel Management (OPM) and the Government Accountability Office (GAO). Additionally, we reviewed previous Management and Performance Challenge Reports to determine if those challenges remain significant for this submission. Finally, we considered publicly available information and internal Commission records. As a result, we identified the five key management and performance challenges discussed herein.

Management and Performance Challenge: Loss of Quorum and Loss of Bipartisan Membership

Background

The Federal Election Commission requires a quorum of four members to exercise its duties and powers under the Federal Election Campaign Act of 1971 (FECA) as amended.[1] The FEC has been without a quorum since April 30, 2025, when Commissioner Allen J. Dickerson resigned, leaving the agency with only three commissioners. On October 3, 2025, Commissioner James E. Trainor III stepped down, leaving the FEC with only two Commissioners belonging to the same political party – an unprecedented situation.

FEC's Rules Require Bipartisanship

FEC Directive 10, last amended in December 2007, contains rules governing the business the Commission may conduct when it has fewer than four members. If all remaining Commissioners are present, Directive 10 lists 20 specific categories of matters upon which the remaining Commissioners may act. For example, the remaining Commissioners may issue notices of filing dates, including filing dates for special elections; make acting appointments for certain senior FEC positions; approve budget estimates for the President and Congress; issue non-filer notices; approve debt settlement plans; approve systems of records notices pursuant to the Privacy Act; conduct the agency head review of labor-management agreements; approve the FEC Management Plan; and approve contracts.

Directive 10, however, specifically limits the Commission's ability to perform these duties without a quorum by requiring approval of all such actions on a bipartisan basis. Specifically, the directive states:

> Notwithstanding any provision of …this directive, approval of any motion or appeal properly before the Commission under this section L shall require the affirmative vote of a majority of the Members of the Commission. However, if such majority comprises exclusively the affirmative votes of Members affiliated with the same political party (or Members whose positions are aligned for the purpose of nomination by the President), then the motion or appeal shall be deemed not approved.[2]

[1] Commission Directive 10, "Rules of Procedure of the Federal Election Commission Pursuant to 2 U.S.C. 437c(e)" (June 8, 1978; amended Dec. 20, 2007).
[2] Commission Directive 10, § L.4.

Conclusion

The FEC's ability to meet its mission is significantly impaired when it has fewer than four members.[3] The Commission is unable to perform some of its most important functions, such as issuing advisory opinions to filers who request guidance; holding hearings; approving enforcement actions and audits; authorizing new investigations or making referrals to other enforcement agencies; making, amending, or repealing rules; and initiating litigation or defending the agency in certain litigation. Additionally, the agency is unable to conduct crucial administrative business, including hiring permanent staff for senior positions and adopting new agency-wide policies, which makes it very difficult, and in some cases impossible, for the agency to ensure compliance with all directives issued by the new Administration.

The fact that the agency has also lost bipartisan membership greatly compounds these challenges. Although there have been times in the past when the Commission lacked a quorum, never before in the FEC's history has it lacked bipartisan membership. The OIG applauds the Commissioners for working to proactively address as many upcoming matters as possible prior to Commissioner Trainor's departure. However, it is unavoidable that pressing issues will soon arise that require Commission action, and the remaining two Commissioners will be unable to address them. It is imperative that a quorum be restored as soon as possible. If that is not possible in the near future, then it is critical that at least bipartisan membership be restored until quorum is reestablished.

[3] We note that there is still work that the agency is able to accomplish without a quorum. For example, FEC staff can continue to help filers and the public understand their obligations to comply with the law, process and review committee reports, provide public access to campaign finance data, and litigate ongoing court cases, process new enforcement complaints and responses, and investigate matters previously authorized by the Commission.

Management and Performance Challenge: Resource Management

Background

The new Administration has adopted several policies aimed at streamlining government operations and reducing government spending. These policies have resulted in a significant reduction in FEC staff over the course of the fiscal year. Additionally, a government-wide hiring freeze was in place for most of calendar year 2025, affecting the agency's ability to bring new staff on board. This creates a resource management challenge for the Commissioners and FEC Management.

Changes in the FEC Workforce

Due to the U.S. Office of Personnel Management's (OPM's) deferred resignation program (DRP) and other efforts to reduce the size of the workforce, combined with natural attrition, there were 52 separations or anticipated separations from the FEC between the beginning of FY 2025 (October 1, 2024) and December 31, 2025.[4] We note that this separation is nearly double the average separation rate for recent years.[5] Table 1 lists separations by vehicle and type, and Table 2 shows the seniority levels of the separated employees.

Table 1. Separations by Vehicle and Type

Separation Vehicle	Retirements	Transfers to Another Agency	Leaving Federal Service	Total
DRP and DRP with VERA[6]	9	N/A	6	15
VSIP[7]	6	N/A	0	6
Standard Separations	11	4	16	31
Total	26	4	22	52

Source: OIG analysis of FEC separation data

[4] This figure is as of November 30, 2025. The initial OPM DRP permitted the agency to allow a participating employee to stay through December 31, 2025, so we extended our analysis to cover a 15-month period, as opposed to analyzing separations that occurred only during FY 2025.

[5] The average separation rate for FY 2020 through FY 2024 was 24.4 separations per year.

[6] Voluntary Early Retirement Authority (VERA) provides agencies with the option to offer voluntary early retirement when the agency is seeking to restructure or downsize.

[7] Similar to VERA, Voluntary Separation Incentive Payments (VSIP) authority, also known as buyout authority, allows agencies that are restructuring or downsizing to offer employees lump-sum payments up to $25,000 as an incentive to voluntarily separate.

Table 2. Seniority Level of Separated Employees

Level	Number of Separations
Executive Level IV	4
GS-15	14
GS-14	12
GS-13	7
GS-12	4
GS-11	3
GS-9	5
GS-8	1
GS-7	2

Source: OIG analysis of FEC separation data

Nearly every office at the FEC has lost staff. Table 3 breaks down the separations by FEC office.

Table 3. Separations by FEC Office

Office	Number of Separations
Offices of the Commissioners	14
Office of the Chief Financial Officer	2
Office of the Chief Information Officer	4
Office of Compliance	13
Office of General Counsel	13
Office of the Staff Director	6

Source: OIG analysis of FEC separation data[8]

The most notable impact of staff departures is in the Offices of the Commissioners, where the majority of staff on board during FY 2025 have separated from the agency, largely due to the separations of four of the FEC's six Commissioners.[9] The Office of General Counsel and the Office of Compliance also saw high levels of separations.

OIG's Annual Risk Assessment

In the OIG's annual risk assessment survey, the most common concern raised by employees was the lack of resources and staffing.[10] For example, in response to the open-ended question "What do you believe are the biggest risks currently facing the organization?", 75 percent of

[8] The Office of Compliance is located within the Office of the Staff Director. Given the Office of Compliance's size and role in the conducting campaign finance oversight activities, we broke it out so that policymakers could more clearly see the impact on it.

[9] When a Commissioner leaves the agency, the staff in their office transfer to another Commissioner's office, remain on staff with the Office of the Staff Director temporarily while closing the former Commissioner's office, or leave the FEC. Commissioners usually employ between 2-4 professional staff, depending on the Commissioner's leadership position.

[10] The OIG sent its annual risk assessment survey to all FEC employees in July 2025. We received 72 responses, which constitutes approximately 26 percent of employees. The OIG also conducted eight risk assessment interviews with specific FEC employees from various offices, selected based upon risk factors.

respondents mentioned budgetary concerns, lack of resources, and/or staffing concerns. When asked specifically whether staffing levels in their division were sufficient to complete work assignments, 45 percent of respondents answered that they were not. Many staff expressed concern about workload capacity and talent retention, and most of those interviewed flagged attrition, retirement, and insufficient operational redundancy as major concerns within the agency. Some staff expressed concerns over additional work assignments due to attrition, procurement bottlenecks, and gaps in IT expertise. We note that the rapid reduction in staffing levels could weaken the control environment and increase agency risk.

Conclusion

The FEC has long struggled with declining resources, which the OIG has specifically identified as management challenges for the last three years. Given that the FEC workforce has undergone such a significant change, it is crucial for the Commissioners and managers at all levels to think strategically and creatively about how the FEC can continue to achieve its mission with these more severe staffing constraints. In particular, it is more important than ever for senior leaders and program managers to approach staffing concerns strategically by realigning processes, planning for succession, and providing focused training to address skills gaps. We note that the current situation may be particularly challenging given the loss of so much institutional knowledge at one time. With the departure of 52 employees between October 2024 and December 2025, the FEC lost 811 years' worth of institutional knowledge and government experience.

This significant change in the FEC's workforce presents both challenges and opportunities. As the Commissioners and Management strategically examine FEC's operations and seek to reimagine how best to achieve the agency's goals, there is the risk of an increasing workload on remaining employees, which may increase staff burnout while potentially diminishing the quality of work. Such a situation increases the risk that the FEC may not be able to provide the level of service that Congress and the public expect of it, and that its ability to ensure the integrity of its operations and security posture could be hindered.

Management and Performance Challenge: Modernization of Information Systems & Cybersecurity

Background

Protecting data, IT systems, and networks from threats remains a top challenge. The FEC was established to protect the integrity of federal campaign finance system by providing transparency and administering and enforcing federal campaign finance laws. In doing so, the FEC makes campaign finance data available to the public, resulting in significant traffic to its website from stakeholders and the general public. In its efforts to streamline transparency initiatives and improve business processes, the Commission is increasingly reliant on technology, as is society as a whole; as such, it is imperative that the Commission continue to prioritize cybersecurity.

We note that there is a close link between the FEC's ability to improve its IT infrastructure and cybersecurity practices and the resources – both funding and staffing – that must be in place to do so. The OIG agrees with the following point made by the FEC in its FY 2025 *Congressional Budget Justification*:

> Amidst the escalating frequency and sophistication of cyber threats, failing to allocate the necessary resources to bolster our cybersecurity workforce would leave the FEC's vital systems and sensitive data increasingly vulnerable.[11]

Recent OIG Oversight Work

As discussed in last year's *Management and Performance Challenges Report*, in FY 2024, the OIG contracted with an independent public accountant (IPA) to audit and assess the effectiveness of the agency's patch management policy and procedures. The IPA found that the FEC Office of the Chief Information Officer (OCIO) has established, maintained, and implemented policies and procedures for its information systems security programs that are generally effective and comply with the applicable requirements, standards, and guidelines.

While the IPA determined that the security controls in place are working as intended, it concluded that these controls are insufficient to reduce the risk of potential security breaches to an acceptable level. The IPA noted that the agency's reliance on legacy systems prevents the agency from promptly patching known vulnerabilities. Additionally, the IPA observed that the FEC has faced significant budget and resource constraints for several years, which have contributed to its inability to remediate vulnerabilities and apply patches to legacy systems and applications. The IPA also reported that, based on the agency's risk-based approach to system security, there are instances that justify not implementing all the standard government-wide system controls outlined in related Office of Management and Budget information system policy

[11] FEC's FY 2025 Congressional Budget Justification (CBJ), at page 14.

and guidance. The audit report contains eight findings and ten related recommendations to improve the FEC's programs.[12]

The issue of budget and resource constraints was a concerning theme throughout the audit. In its responses to the IPA's findings and recommendations, Management repeatedly agreed that the issues raised by the IPA were important and should be addressed, but noted that the agency's ability to do so is significantly constrained by budget and resource limitations.[13] For example, the OCIO's personnel level has decreased by close to ten percent in recent years and is currently at the level it was in FY 2019. This is despite the significant increase in demands on the OCIO due to both increased campaign spending activity as well as the initiation of several IT modernization efforts, including those aimed at improving the electronic filing system, the campaign finance data pipeline, and the legacy applications recently migrated to the cloud. It is our understanding that the Commission has recognized the need to increase OCIO resources and that the Personnel Committee has approved hiring for six OCIO positions. The OIG was informed that, unfortunately, most of these positions have not been filled due to budget restrictions and/or the hiring freeze implemented for most of calendar year 2025. We confirmed that the FEC recently posted vacancy announcements for two critical IT security positions.

During the OIG's annual risk assessment, FEC staff also raised concerns about IT challenges at the agency.[14] In the OIG's annual risk assessment survey, when asked "What do you believe are the biggest risks currently facing the organization?", more than one-third of respondents specifically mentioned IT issues. During interviews, IT concerns were repeatedly raised. For example, FEC staff reported that the 20 to 30-year-old systems increase the agency's cybersecurity vulnerabilities. Other responses indicated that FEC staff increasingly fear outages of critical systems during key campaign finance filing deadlines and are also concerned that the new modernization investments risk obsolescence before the agency even implements them. Furthermore, some staff expressed concern that if these vulnerable systems remain in service, hackers may eventually compromise them, potentially requiring the agency to request emergency funding from Congress to either mitigate the impact or hastily replace the affected system. Overall, it is clear that FEC's IT challenges are acutely felt by its staff.

Positive Progress

In FY 2024, the FEC was awarded a grant from the General Services Administration's Technology Modernization Fund to help fund the modernization of a critical legacy system, FECFile. FECFile is the agency's free electronic filing software used by over 16,000 political committees and other filers.[15] The current version of FECFile is almost 30 years old and is a desktop application that runs only on computers using Windows. In contrast, the new version

[12] Management fully concurred with nine recommendations and partially concurred with one recommendation.
[13] Management has noted that the OCIO has regularly made budget requests over numerous past budget cycles to address the agency's needs in this area.
[14] The OIG sent its annual risk assessment survey to all FEC employees in July 2025. We received 72 responses, which constitutes approximately 26 percent of employees. The OIG also conducted eight risk assessment interviews with specific FEC employees from various offices, selected based upon risk factors.
[15] FEC FY 2026 CBJ, at page 4.

under development, called FECfile+, is cloud-based and can be accessed from any computer – an important change that will significantly improve the experience of FEC filers.

The agency continued its work to develop FECfile+ in FY 2025, including receiving an Authority to Operate Assessment and Authorization. This is a key step in the development process because it confirms that a system meets the agency's security and privacy standards. The OCIO continued development testing, working closely with the Reports Analysis Division. The OCIO had hoped to introduce FECfile+ to its first outside users this fall, but the government shutdown unfortunately delayed those plans. The OCIO has informed the OIG that it is working to determine a new launch date.

As discussed in detail in our IT security audit, many of the agency's IT challenges are directly attributable to the agency's reliance on legacy systems. The agency made some progress in reducing its dependence on those systems in FY 2025. For example, the agency retired the legacy advisory opinion search application and replaced it with an online tool accessible on the FEC's website. The agency is now working to replicate that success by similarly transitioning two other legacy search applications: those for rule-making and rule-making comment entries. The agency is also working to develop modernized solutions for several mission-critical legacy applications used by the Commissioners' offices and Management to conduct crucial agency business.

Lastly, there are two mission-essential legacy applications used daily by both FEC staff and Commissioners that are not compatible with the most modern, secure operating systems. As a result, much of the agency is forced to use outdated, soon-to-be unsupported operating systems simply because it is beholden to these two tools. Older IT systems often have issues, and recently, the FEC's operations were significantly disrupted when a vendor made a licensing error that prevented the release of critical and high security patches required to protect this older operating system. The good news is that the agency is actively working with a contractor to determine the best way to migrate those critical agency functions to modern, more secure solutions, which would also allow the agency to switch to the most up-to-date operating system offered by the agency's vendors.

Conclusion

The most significant challenge to the success of the above IT modernization efforts at the FEC is funding. Although the TMF grant helped fund progress on the FECfile+ project, that funding expires in FY 2027. Without additional funding, the FEC is at risk of losing the momentum the original grant helped to provide.

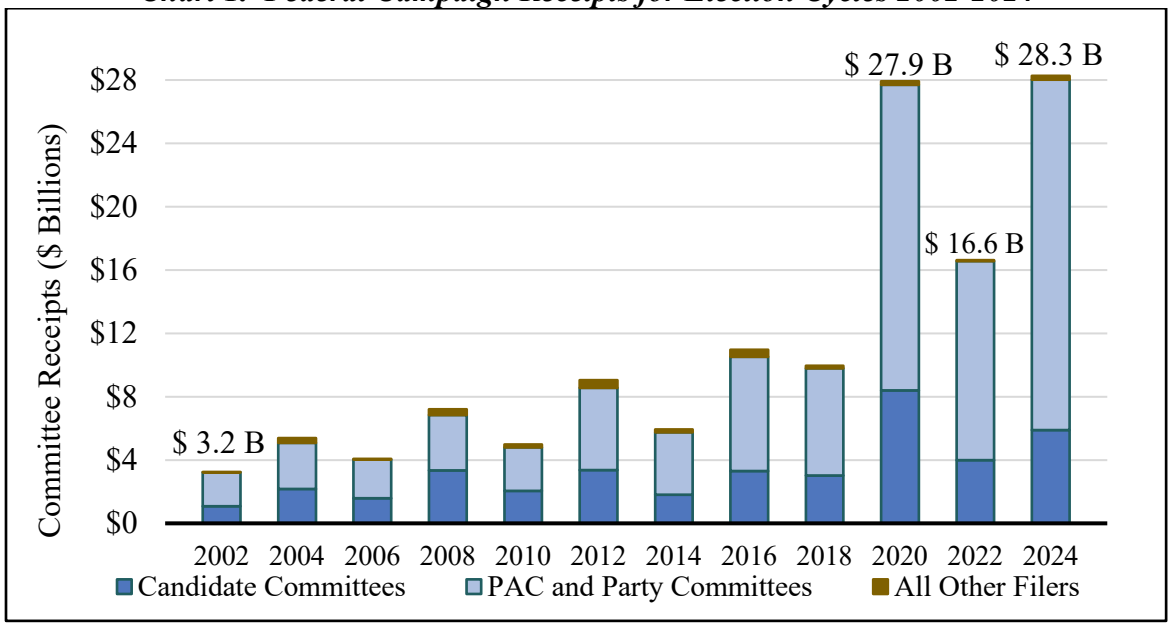
Additionally, the continued reliance on legacy systems remains a significant challenge. The inability to modernize agency systems in a sustainable and timely manner undermines current risk mitigation, security, and mission-critical operations, thereby weakening the agency's control environment.

Management and Performance Challenge: Growth of Election Contributions

Background

Much has changed in the 50 years since the FEC was first created by Congress. In 1976, the first presidential election cycle after the FEC was established, federal campaigns raised and spent approximately $300 million. In stark contrast, during the 2024 presidential election cycle, total campaign committee receipts were approximately $28.3 billion –a more than 9,000 percent increase.

Chart 1. Federal Campaign Receipts for Election Cycles 2002-2024



Source: OIG analysis of FEC filings. Contributions are segmented by candidate, party/PAC, and "other" committee types.

The total number of transactions subject to FEC regulation and oversight has also dramatically increased, especially in recent years. Transactions are reported in mandatory filings with the FEC and are comprised of itemized details of receipts (including contributions), disbursements (including expenditures), and other financial activity. Some highlights of transaction growth, which are further illustrated on the following page, include:

- Between 1978 and 2000, the total number of transactions subject to FEC regulation and oversight increased from approximately 340,000 to nearly 2.0 million per election cycle.

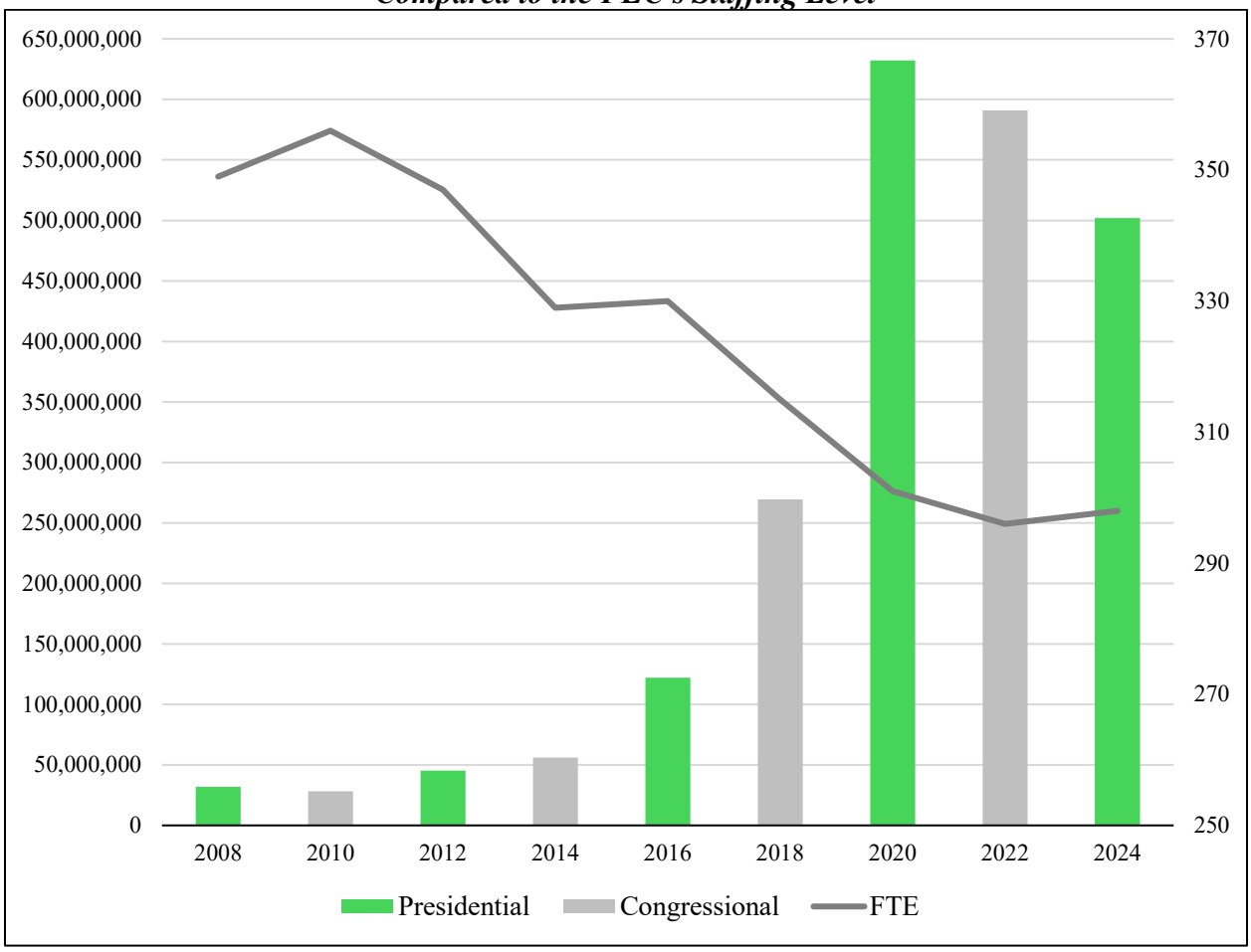
- By the 2024 election cycle, the number of transactions handled by the FEC had grown to 502.7 million – a nearly 1,500-fold increase since 1978 and an over 250-fold increase since 2000.

- The 2020 election cycle had the highest number of transactions in FEC's history – over 630 million transactions for the 2020 election cycle, followed by the 2022 election cycle with 590 million transactions.

Impact on FEC Staff and IT Infrastructure

The significant growth in campaign finance activity directly affects both the FEC staff and its IT infrastructure. When combined with the fact that the FEC's workforce has been shrinking over the last decade, this growth in reportable activity presents a unique challenge for the agency. Chart 2, which the FEC published as part of its FY 2026 *Congressional Budget Justification*, shows the increase in transactions for recent election cycles, as well as the decreasing number of FEC full-time equivalents (FTEs):

Chart 2. Number of Transactions Reported to the FEC by Election Cycle Compared to the FEC's Staffing Level



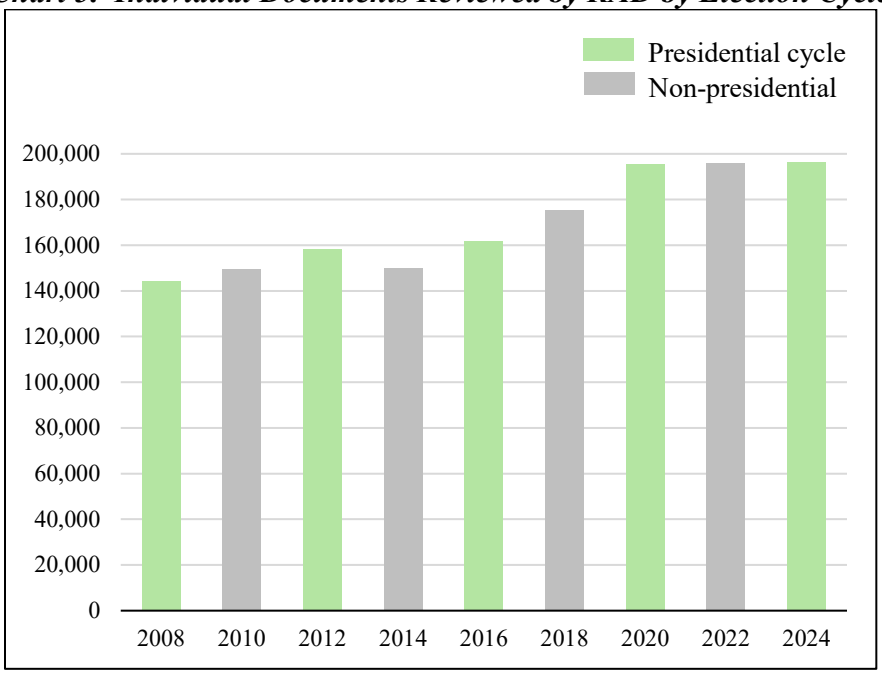
Source: FEC's FY 2026 Congressional Budget Justification.

One division directly impacted by the increase in campaign election activity is the Office of Compliance's Reports Analysis Division (RAD). Nearly every report submitted to the FEC must be reviewed by RAD to determine whether all forms and applicable schedules are complete and

properly disclose the required information, the appropriate parties have signed all submissions, the calculations included are correct, and no contribution limits have been exceeded.

Unsurprisingly, RAD's workload has increased significantly in the last decade. Chart 3 shows the number of individual documents RAD reviewed by election cycle. These documents include the reports of receipts and disbursements prepared by political committees and other filers, statements of organization, and miscellaneous documents such as responses to FEC requests for additional information, filer requests for changes in filing frequency, and disavowal responses. During the 2008 presidential election cycle, RAD reviewed 144,166 individual documents, but by the 2024 presidential cycle, that number grew to 196,175 – a 36 percent increase.

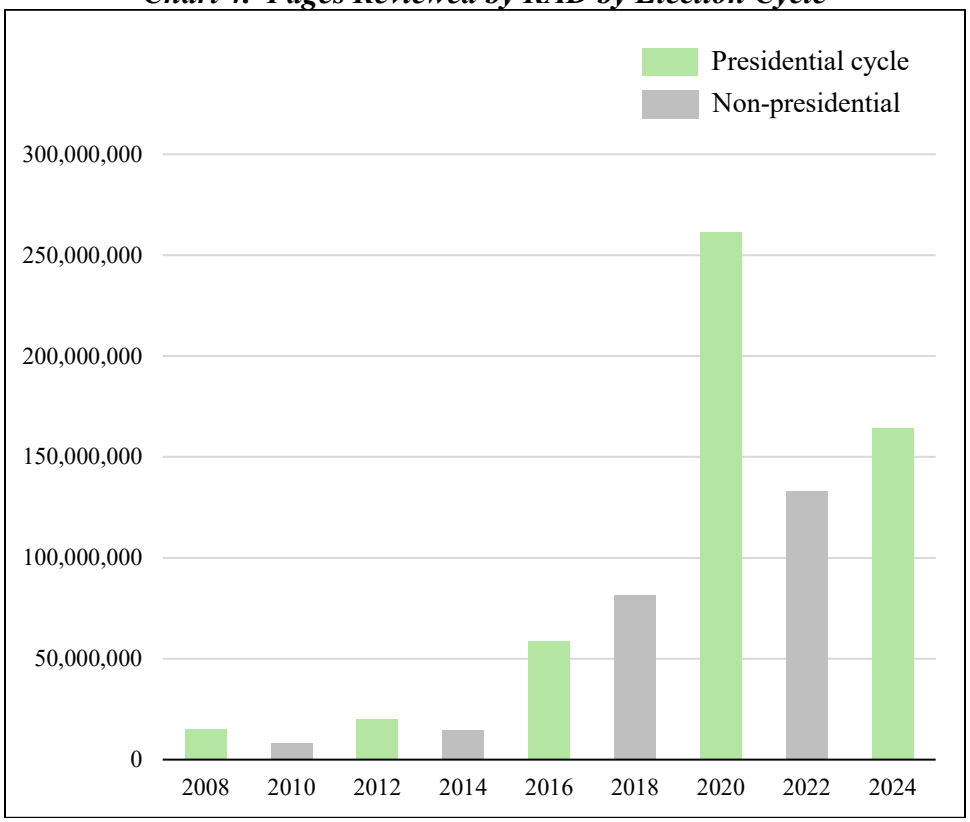
Chart 3. Individual Documents Reviewed by RAD by Election Cycle



Source: RAD analysis provided to the OIG.

Chart 4 provides an even more in-depth picture of RAD's workload, breaking down the number of pages RAD had to review for each election cycle. During the 2008 presidential election cycle, RAD reviewed 15,034,325 pages of information. By 2024, RAD's workload had increased by nearly 1,000 percent, when it had to review 164,502,936 pages. The 2020 election cycle in particular presented a significant challenge to RAD, when the division had 261,585,475 pages to review.

Chart 4. Pages Reviewed by RAD by Election Cycle



Source: RAD analysis provided to the OIG.

Another area where the increase in reportable transactions is straining the FEC's resources is its IT infrastructure. Every single reportable transaction must be made publicly available on the FEC's website. As the FEC explained in its FY 2026 *Congressional Budget Justification*:

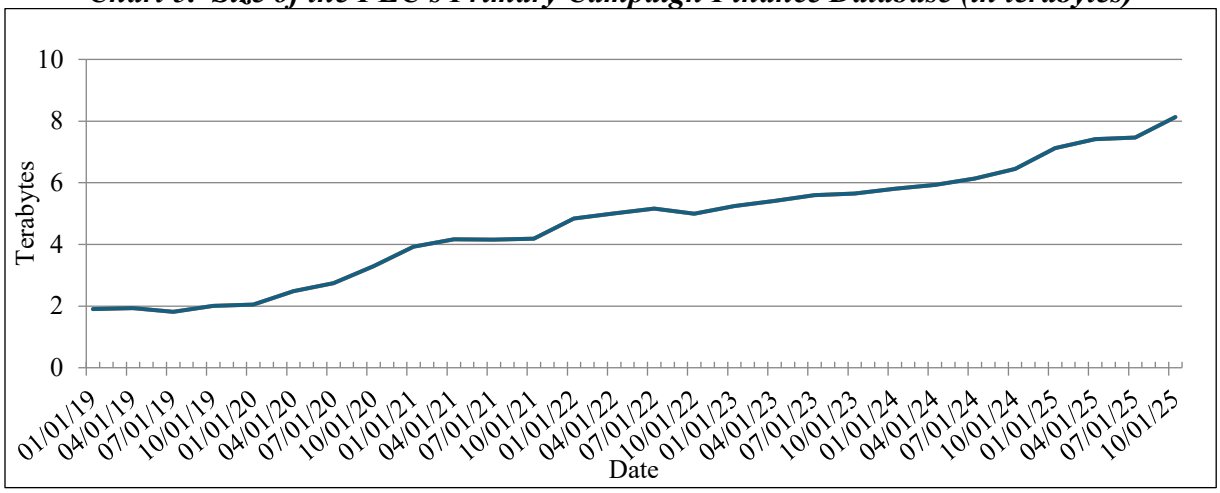
> The FEC provides the public access to this reported campaign finance data on FEC.gov and directly through the FEC's Application Programming Interface (API), which permits users to customize their own data searches. Public interest in the FEC's campaign finance data continues to grow, with the FEC's campaign finance data API receiving over **648 million hits during the 2024 cycle** representing a **59 percent increase** over the number of API hits received during the 2020 presidential election cycle. These trends in the public's interest in campaign finance activity illustrate both how crucial it is for the agency to continue efforts to support and secure access to this data and how challenging it is to do so without additional funding tools to help receive and process campaign finance reports, review them for accuracy and compliance and ensure the resulting data continues to be readily available to meet the public's needs despite the significant growth in the volume of data maintained by the agency.[16] (emphasis added)

The growth in reportable transactions means that the FEC must store enormous quantities of data both to conduct its FECA-related compliance and enforcement work and to meet its

[16] FEC FY 2026 CBJ, at page 5 (internal citations omitted).

statutory requirement to make certain data available to the public. Chart 5 shows the increase in the size of the FEC's primary campaign finance database, which is used by the Office of General Counsel and the Office of Compliance to conduct their FECA-related work. In January 2019, FEC needed only 1.91 terabytes to store its data; by October 2025, its need increased over 425 percent to 8.13 terabytes.

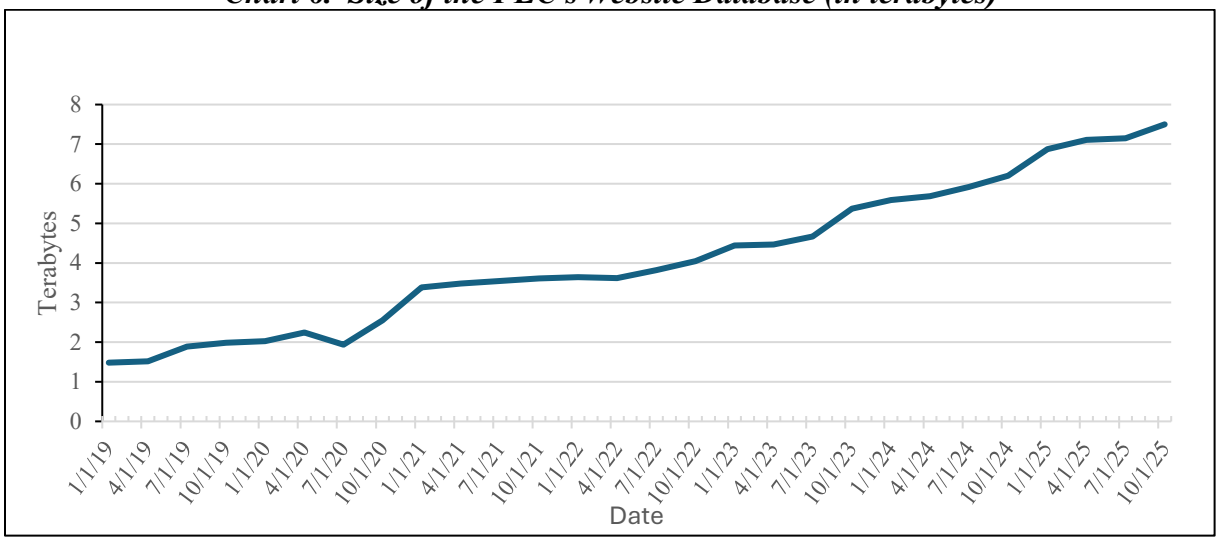
Chart 5. Size of the FEC's Primary Campaign Finance Database (in terabytes)



Source: OCIO analysis provided to the OIG.

Chart 6 shows the increase in the amount of data that the FEC must make available on its website. In January 2019, the FEC hosted 1.48 terabytes of data on its website. That number grew to 7.5 terabytes by October 2025 – a more than 500 percent increase.

Chart 6. Size of the FEC's Website Database (in terabytes)



Source: OCIO analysis provided to the OIG.

As the volume of campaign data continues to grow, the associated costs of cloud hosting and data processing inevitably increase. While the OIG is informed that the OCIO is actively optimizing the cloud environment and implementing a range of cost-saving measures – such as prepaying for services to secure vendor discounts and leveraging newer, more efficient

technologies – the growth of data remains persistent and often unpredictable, particularly during peak election years. If additional resources are needed to process and manage this expanding data load, the FEC may face difficult tradeoffs in the future. Despite its best efforts to control costs, the FEC may ultimate need to limit spending in other critical IT areas, such as long-overdue modernization initiatives, in order to meet its escalating database and storage requirements.

Conclusion

The exponential growth of campaign spending presents an additional challenge for the FEC as agency leadership seeks to to manage a significantly reduced workforce and limited budget extremely carefully, as discussed in the Resource Management Top Challenge above.

Management and Performance Challenge: Outdated Statutory Pay Structure

Background

Executive-level compensation remains an issue for the agency. The Federal Election Campaign Act (FECA) specifies the level of pay for Commissioners, the Staff Director, and the General Counsel. Because of a long-standing pay freeze, the pay for Commissioners is well below that of many line FEC employees. FEC Commissioners serve a term of six years, which is longer than traditional political appointees working in a presidential administration. As discussed below, because of the increased time commitment, Congress may want to consider exempting FEC's Commissioners, as well as other similar commissioners or board members, from the pay freeze for political appointees.

The General Schedule (GS) has outpaced even the *unfrozen* salary levels of the Executive Schedule, which means the Staff Director and the General Counsel would similarly be paid less than many of the employees they oversee. This may have contributed to difficulty in permanently filling these positions, given that the FEC has not had a permanent General Counsel since 2013, and the Staff Director has been dual-hatted since 2011.

Commissioner Pay

The FECA states that FEC Commissioners are to be paid equivalent to level IV of the Executive Schedule. Executive Schedule pay for political appointees has been largely frozen since 2010, with one adjustment of 1.9% in 2019.[17] As a result, FEC Commissioners receive a salary of only $158,500, which is less than the salaries paid to FEC's Senior Level (SL) staff and most GS staff at levels 14 and 15. Specifically, during FY 2025, 103 of the agency's staff received higher salaries than the Commissioners. Currently, all ten SLs, all GS-15s, and 58 of the agency's 68 GS-14s earn more than the Commissioners.

We note that the much higher compensation available in the private sector can make it difficult for an Administration to recruit qualified individuals who are willing to take a substantial pay cut (for six years) compared to what they could make in the private sector. For example, long-term occupational projections completed by the District of Columbia Department of Employment Services predict that chief executive compensation in the District of Columbia will average $411,286 between 2022 and 2032.[18] That same study estimates that the salary of an experienced lawyer will average $312,603 during the same period.

[17] The most recent U.S. Office of Personnel Management (OPM) memorandum on the pay freeze for certain appointed political officials can be found at https://www.opm.gov/chcoc/latest-memos/continued-pay-freeze-for-certain-senior-political-officials.pdf.
[18] These projections are available at: https://does.dc.gov/sites/default/files/dc/sites/does/publication/attachments/DC%202022-2032%20Long%20Term%20Occupational%20Projections_.pdf

The issue of non-competitive pay is exacerbated by the high costs of living and working in the Washington, D.C. metro area, which is routinely ranked among the top ten most expensive cities in the United States. Indeed, one 2024 study found that $100 in the Washington-Arlington-Alexandria metro area would buy goods and services worth only $89.85.[19] Considering this, the real value of Executive Schedule pay – which does not provide for a locality pay adjustment – in the Washington, D.C. metro area is roughly 10% lower than the nominal value.

One possible solution would be to simply remove the freeze on commissioner salaries in favor of the annual published schedule pay rates that apply to non-political Executive Schedule employees. At the FEC, where all Commissioners are paid at the EX-IV rate, Commissioner pay would increase from $158,500 to $195,200, using the most recently published schedule.[20] The full cost for all six Commissioners would increase by only $220,200 from $951,000 to $1,171,200. This would not entirely address the pay issue, as senior leaders in the agency would still make more than the Commissioners, but it would at least be a start at addressing the pay disparity.[21]

The FEC is not the only agency affected by the freeze on commissioner pay. The OIG identified 15 other agencies led by commissions or boards that face a similar problem.[22] Table 4 lists these agencies and calculates the estimated cost of moving to the 2025 published Executive Schedule pay rates. As shown, if the pay freeze were lifted for all 15 agencies plus the FEC, the estimated cost to adjust the salaries of these 73 commissioners/board members would be approximately $2.7 million.

[19] The Tax Foundation, "Purchasing Power: Real Value of $100 by Metropolitan Area, 2024", available at: https://taxfoundation.org/data/all/state/purchasing-power-real-value-100/

[20] The 2025 Executive Schedule pay rates can be found on the OPM website at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/EX.pdf.

[21] General Schedule staff are salary limited at the rate of pay for Executive Schedule Level IV. At this rate, Commissioner pay would be greater than or equal to the salaries of all FEC staff other than SL senior leadership.

[22] The OIG identified these agencies by examining all agencies led by a board or commission that have an Inspector General. We then removed from our list those agencies where the commissioners/board members were not all full-time Federal employees or where some commissioners/board members served in other capacities, such as Cabinet Secretaries or State Governors. We also removed from our list any agencies that had special pay structures in place for their board members, such as the Federal Reserve or the National Science Foundation. Therefore, please be aware that due to these exclusions, this list does not represent all commissioners/board members with frozen Executive Schedule pay. According to OPM's FedScope website, as of September 2024 (the most recent period for which data is available), there were approximately 45 Federal employees paid at the EX-II level, 100 Federal employees paid at the EX-III level, 253 Federal employees paid at the EX-IV level, and 19 Federal employees paid at the EX-V level.

Table 4. Select Agencies With Similar Leadership Pay Caps[23]

Agency	Board Members at EX-II	Board Members at EX-III	Board Members at EX-IV	Board Members at EX-V	Estimated Salaries at Current (Frozen) Level	Estimated Salaries at Published (Non-Frozen) Level	Estimated Cost of Unfreezing Pay
Commodity Future Trading Commission		1	4		$802,400	$988,300	$185,900
Consumer Product Safety Commission		1	4		$802,400	$988,300	$185,900
Election Assistance Commission			4		$634,000	$780,800	$146,800
Equal Employment Opportunity Commission		1	4		$802,400	$988,300	$185,900
Farm Credit Administration		1	2		$485,400	$597,900	$112,500
Federal Communications Commission		1	4		$802,400	$988,300	$185,900
Federal Election Commission			6		$951,000	$1,171,200	$220,200
Federal Labor Relations Authority			1	2	$455,500	$561,400	$105,900
Federal Maritime Commission		1	4		$802,400	$988,300	$185,900
Federal Trade Commission		1	4		$802,400	$988,300	$185,900
National Credit Union Administration		1	2		$485,400	$597,900	$112,500
National Labor Relations Board		1	4		$802,400	$988,300	$185,900
Nuclear Regulatory Commission	1	4			$856,700	$1,055,700	$199,000
Railroad Retirement Board		1	2		$485,400	$597,900	$112,500
Securities and Exchange Commission		1	4		$802,400	$988,300	$185,900
U.S. International Trade Commission		1	5		$960,900	$1,183,500	$222,600
Total	**1**	**16**	**54**	**2**	**$11,733,500**	**$14,452,700**	**$2,719,200**

We note that the vast majority of these commissioners/board members have terms of five or more years, showing that Congress intended them to serve longer than other traditional appointees in a presidential administration. See Table 5. In addition, all of the statutes establishing these agencies provide that commissioners/board members may be reappointed, held over (where the individual continues serving for a specified period after their term expired), or both. As a result, these individuals are often making a significant time commitment well over the four or fewer years that traditional political appointees tend to serve during a presidential administration. Consequently, Congress may want to consider exempting them from the pay freeze to which most political appointees are subject.

[23] We note that this chart contains only estimates based on the statutory provisions establishing the pay for these positions. In some situations, if a political appointee is a member of of the Senior Executive Service (SES), they may be able to keep their SES base pay instead of converting to the Executive Schedule, and this chart does not take that into account. Moreover, this chart does not take any other direct or indirect costs into account, such as contributions to retirement programs.

Table 5. Commissioner Terms for Select Agencies

Agency	Term (years)	Agency	Term (years)
Commodity Future Trading Commission	5	Federal Maritime Commission	5
Consumer Product Safety Commission	7	Federal Trade Commission	7
Election Assistance Commission	4	National Credit Union Administration	6
Equal Employment Opportunity Commission	5	National Labor Relations Board	5
Farm Credit Administration	6	Nuclear Regulatory Commission	5
Federal Communications Commission	5	Railroad Retirement Board	5
Federal Election Commission	6	Securities and Exchange Commission	5
Federal Labor Relations Authority	5	U.S. International Trade Commission	9

Staff Director and General Counsel

The FECA sets the Staff Director's pay at level IV of the Executive Schedule and the General Counsel's pay at level V of the Executive Schedule. Both the Staff Director and General Counsel positions supervise personnel at the GS-15 and SL pay levels, most of whom earn salaries higher than those at levels IV or V of the Executive Schedule. This disparity creates significant challenges in the recruitment and retention of talent for two of the most senior career positions at the FEC. For example, the senior leadership roles of the Staff Director and Chief Information Officer (CIO) have been occupied by the same individual since August 2011. Without a fully dedicated CIO to address technological issues, allocate and utilize resources effectively, and establish adequate processes for the agency's protection and security, the agency will remain at risk.

Similarly, the Deputy General Counsel for Law is concurrently serving as the Acting General Counsel and has been doing so since September 2016. This has the potential to put the agency at risk of not effectively and efficiently meeting its mission requirements, as robust internal dialogue and diversity of opinion are essential to ensuring the agency considers competing legal theories and courses of action.

Management previously reported that the Commission adopted legislative recommendations and urged Congress to remove the statutory references to the Executive Schedule in FECA with respect to the FEC Staff Director and General Counsel positions. The removal of that reference would ensure the two positions are compensated under the same schedule as the Commission's other senior managers and would promote balance and effectiveness in administering and enforcing the federal campaign finance law.

Conclusion

Frozen executive compensation combined with the rigorous appointment process may deter many qualified applicants from seeking to serve as Commissioners. Similarly, the low pay levels may create recruitment challenges for the agency as it seeks to fill its most important career positions. The OIG supports the FEC's legislative proposals designed to address these problems.

Management's Response to the Office of Inspector General's Statement on the Federal Election Commission's Management and Performance Challenges[1]

December 15, 2025

Challenge 1: Loss of Quorum and Loss of Bipartisan Membership

Following the April 30 departure of Commissioner Allen J. Dickerson from the agency, the FEC on May 1, 2025, began working without a quorum of four Commissioners. The Federal Election Campaign Act of 1971, as amended (FECA or the Act), requires an affirmative vote of at least four Commissioners to make key decisions in many areas, including regulations, advisory opinions, audits, and enforcement matters. However, there are matters on which the Commission may continue to act during a lapse in quorum long as it has bipartisan representation. These are enumerated in Commission Directive 10, Section L, and include approval of notices of filing dates, non-filer notices, debt settlement plans, administrative terminations, and appeals under the Freedom of Information and Privacy Acts.

FEC Management concurs with the Office of Inspector General that the agency's ability to meet its mission is significantly impaired when it has fewer than four members on the Commission. When Commissioner James E. "Trey" Trainor III, departed the Commission on October 3, 2025, the Commission lost bipartisan representation as well. Thus, the Commission is no longer able to perform any of the administrative tasks outlined in Directive 10, including the approval of notices of filing dates, debt settlement plans, administrative terminations, and other core Commission functions that are vital to political committees' ability to comply with the FECA and Commission regulations.

All of the requirements of the FECA and Commission regulations remain fully in effect despite the Commission's loss of quorum and bipartisan representation. Thus, political committees and other filers must continue to disclose their campaign finance activity to the FEC on the regular schedule and individuals, committees, and other groups remain subject to the limitations and prohibitions of the Act.

Agency staff remain ready to help committees and the public understand and comply with the law. For example, the FEC's Reports Analysis Division, Audit Division, Information Division, and Information Technology Division, among others, are still performing all their duties, answering questions, maintaining the agency's website, conducting ongoing audits, and processing and reviewing disclosure reports and other filings. While the Commission cannot take action on many legal matters, FEC's Office of General Counsel staff continues to litigate ongoing court cases, process new enforcement complaints and responses, and investigate matters previously authorized by the Commission. Documents recommending actions continue to be prepared by agency staff for Commission consideration, even though decisions must be delayed until a quorum is restored when new Members join the Commission.

Despite FEC staff's ongoing work, the agency's current lack of bipartisan representation poses significant internal senior management challenges that are unprecedented in the history of the

[1] Management consists of the agency's senior managers, including the Staff Director, Acting General Counsel and Chief Financial Officer.

agency. These challenges include internal management decisions such as the inability to approve budget estimates, including concurrent budget submissions to the President and Congress, as well as the inability to approve personnel actions at the senior management level.

Challenge 2: Resource Management

Over the past decade, the FEC has been challenged to recruit and retain talent necessary to meet the agency's workload and hiring goals, in part as a result of the FEC's relatively flat funding levels over this period. Between FY 2014 and FY 2024, the FEC's overall staffing levels were reduced by nearly 11 percent. From October 1, 2024 through December 31, 2025, staffing levels were reduced an additional 17 percent. This rapid reduction in staffing levels, in addition to reductions made over previous fiscal years, presents a challenge to Management as they continue work to ensure the agency fulfills its mission.

Management agrees with the OIG's conclusion that during this period of organizational change the agency must take a strategic approach to workforce planning and staffing, ensure effective knowledge management practices are in place, and assess and remediate any skills gaps that are identified. As a small agency with limited resources, the FEC performs informal and formal workforce assessments, skill gap analyses, and staffing planning on an ongoing basis. Hiring managers, division directors, and Senior Level (SL) managers evaluate the ability of their workforce to complete outstanding work, project future workload, and monitor attrition trends, and then use that information to make recommendations to agency leadership regarding staffing levels for their respective offices/divisions. Due to the agency's relatively small size, this evaluation includes reviewing each position as well as the division's needs in order to decide whether to backfill a position, request a different or updated position that better assists the office/division in meeting emerging needs, or decide the position is no longer needed. The Staff Director, Acting General Counsel, and Chief Financial Officer, in conjunction with other senior management, evaluate the priority of these staffing requests in light of the number of FTE that the agency's budget is able to support, as determined by the Office of the Chief Financial Officer. Through this coordination, agency leadership assesses how best to allocate limited FTE positions, as supported by the budget, across the agency to achieve the FEC's mission. The position prioritization is presented to the Commission's Personnel Committee on an ongoing basis. The Personnel Committee assesses the prioritization of positions and has the ultimate decision-making authority to approve, modify, or disapprove positions for hiring.

Similarly, Management focuses its succession planning and training efforts on strategies that cut across offices and divisions, thus facilitating a wholistic strategy for ensuring the agency continues to foster a culture of high individual and organizational performance in order to meet its mission requirements and protect the integrity of its operations and security posture.[2] These strategies include:

- **Creating a talent pipeline** – To ensure employees are prepared and able to step into critical roles, employees receive training and cross train, the Office of Human Resources works with managers to bridge grade level gaps within offices when creating new or updated

[2] Management's efforts to protect the integrity of its operations and security posture are discussed more fully in Management's Response to Management Challenge 3.

position descriptions, and detail/acting positions are selected through competitive processes. The FEC is able to regularly fill detail/acting positions from internal candidate pools, demonstrating that internal talent is prepared to bridge staffing gaps realized through attrition. Supervisors are also required to engage in talent management activities for which they are evaluated in their annual performance appraisals.

- **Preparing to fill a position** –Positions to be filled are prioritized by leadership and approved by the Personnel Committee on an ongoing basis. Hiring managers are advised to keep hiring documents as up-to-date as possible, evaluate what their office/division needs regarding staffing, establish relationships with recruitment outlets, and move quickly if/when approval is received.
- **Knowledge management** – Managers engage in knowledge management, including the creation of how-to manuals, policies, procedures, references, guides, wikis, etc., that are stored in centralized locations and accessible to the pertinent parties, as a part of their regular management practice as well as a part of succession planning. This is covered under the supervisory performance standard "Business Acumen." This strategy is particularly useful for foreseeable retirements and unique positions that lack organizational or personnel redundancy. The FEC also maintains effective, decentralized training programs, with individual offices determining the necessary trainings for their highly specialized subject-matter experts. In these cases, skills gaps are identified at the division level and training plans are developed at the division level.

Challenge 3: Modernization of Information Systems & Cybersecurity

The federal government continues to issue numerous cybersecurity-related initiatives to defend against the escalation of cyber-attacks, the increased activity of ransomware compromises and the attacks to widespread use of software systems. In response to these ever-growing cybersecurity threats, the FEC continually works to improve its security posture to protect its information systems through a combination of implementation of cybersecurity strategy and training, undertaking modernization projects for legacy applications when possible, and meeting mandated requirements and remediation measures. However, the reductions in staffing levels over the past several year has left only a small number of employees who are able to work on modernization projects and information security mandates and remediation measures. As a result, the Commission must rely on outside vendors to help meet these requirements. As discussed below, even with vendor support the agency is not confident it will be able to fully remediate vulnerabilities in its legacy systems or finish work to replace and decommission these systems within recommended timeframes unless greater resources become available.

Cybersecurity Strategy

The Office of the Chief Information Officer (OCIO) secures the Commission's IT infrastructure against the threats of data misuse, destruction and inappropriate disclosures, while ensuring continuity of operations in the event of a disaster. The Commission actively works to secure its IT infrastructure, including implementing cybersecurity directives from the Cybersecurity and Infrastructure Security Agency (CISA) of the Department of Homeland Security (DHS) as well as implementing mandatory security awareness training programs for its employees and contractors. In addition, the FEC continues to develop strategies and initiatives relating to risk assessments of operations, disaster recovery and continuity of operations in the event of a disaster. The FEC recognizes that perfect security is not feasible; rather, it is a continuing process of detecting risks,

making process improvements and hardening defenses. For that reason, the benchmark of the FEC's approach to cybersecurity has always been practicability and continuous improvement. The FEC's cybersecurity strategy, noted in the FEC IT Strategic Plan, outlines an approach of securing its infrastructure and preventing intrusions through a holistic cybersecurity program led by the Chief Information Security Officer (CISO). The strategy implements leading practices for a comprehensive cybersecurity from the National Institute for Standards and Technology's (NIST) Cyber Security Framework (CSF) and industry best practices.

Security Risks Posed by Legacy Applications

To address the security risks posed by legacy applications, the OCIO continues to conduct architecture research and assessments as it undertakes a multi-year effort to modernize legacy applications, actively refining strategies to ensure readiness once funding and staffing are available.

The OIG conducted an audit of the Commission's Security Patches and Vulnerabilities Management Programs covering FY 2024. Overall, the audit found that the OCIO has established, maintained and implemented policies and procedures for its information systems security programs that are generally effective and comply with the applicable Office of Management and Budget (OMB) requirements and NIST standards and guidelines. However, the auditors also determined that while system security controls in place are working as intended, they are not sufficient to reduce the risk of potential security breaches to an acceptable level. This is partially due to the FEC's reliance on legacy systems. Moreover, the audit noted that the FEC has had significant budget and resource constraints for several years that have contributed to its inability to remediate vulnerabilities and patches related to legacy systems and applications.

The Commission can confirm that the agency's systems have shown no evidence of compromise. However, this success has been achieved within the constraints of an increasingly austere budget environment, and OCIO management has made significant trade-offs in order to secure the FEC's systems within its limited staffing levels and project funding. Moreover, given the agency's current funding outlook, the Commission does not anticipate that OCIO will be able to remediate many of the findings included in this audit in the near future. Thus, as the results of this audit show, the FEC will be challenged to continue to safeguard its IT systems absent additional staffing, tools and funding. The Commission has made clear in its most recent Congressional Budget Justification that without sufficient funding for IT systems and projects the agency's mission is at risk. The findings of this audit serve to provide further evidence that the FEC needs additional funding to modernize the rest of its legacy systems as well as to hire additional staff to perform the job of securing the FEC's environment.

OCIO updated its IT Strategic Plan to outline activities conducted by OCIO to continue to handle the agency's responsibilities with insufficient staffing and budget levels. The plan outlines OCIO's strategic activities that focus on IT modernization, security, privacy and a results-driven workforce. OCIO has demonstrated that the agency's focus on IT modernization has been successful, but its work is not complete. It is essential to continue working on these activities to ensure the 21st century FEC delivers results and effectively serves its 21st century constituents. The FEC is undertaking several multi-year IT modernization projects to update the agency's systems and data processing capabilities to use cloud-native architecture, improve services

provided to the public and better ensure the security of the FEC's networks, systems and data. It also has begun working with a contractor to determine the best modern solution for its legacy case management and document management systems. The FEC agrees with the OIG's recommendation to prioritize addressing the security challenges posed by legacy applications and is working, within the agency's limited resources, to achieve this outcome through the cybersecurity strategy described in its IT Strategic Plan, as well as planned and current modernization projects.

Security Mandates and Remediations

The Commission continuously improves its security architecture. The Commission's security operation, along with continuous diagnostics and mitigation, allows the agency to identify and remediate vulnerabilities. In partnership with DHS and other strategic partners, the FEC identifies, protects, detects, responds to and recovers from the impact of known and potential security threats. In recent years, the FEC has worked with DHS to complete a security architecture review, a risk vulnerability assessment, two threat hunts, and two remote penetration tests. Of note, the penetration tests performed on FEC.gov found no major vulnerabilities. Through the engagement with the DHS, the FEC has recently implemented various cybersecurity tools, including vulnerability scanning tools and mobile threat defense. These engagements with DHS enable the FEC to identify and address cybersecurity gaps and thus improve its overall security posture. The FEC also works with vendors to ensure security and performance in its internal network. For example, in 2025, it completed an Office 365 Network Performance Assessment. With only a small number of employees who are able to work on information security mandates and remediation measures, the assistance of outside vendors and DHS is essential to help meet these requirements.

Challenge 4: Growth of Election Contributions

As illustrated in the OIG's description of this management challenge, increases in the amount of money raised and spent in federal elections, and changes in the way political committees raise and report contributions, have resulted in a steep growth in the number of campaign finance transactions reported to the FEC. Campaign finance disclosure data must be received, processed and made available to the public within tight deadlines for public disclosure, and it must be safeguarded to ensure the integrity and accessibility of the information. Each of these transactions represents a data element that must be received by the FEC, added to our database and disclosed and made searchable on the FEC website and via the FEC campaign finance Application Programming Interface (API).

The FEC receives campaign finance reports, statements, and other disclosure documents from more than 16,000 political committees and other filers. During the 2024 election cycle, the FEC received campaign finance reports with 502.7 million transactions disclosing $28.3 billion in receipts and $28.0 billion in disbursements, a 1.3 percent and 3.0 percent, increase respectively, over the last presidential election cycle. Nearly every report submitted to the FEC must be reviewed to ensure that the public record provides a full and accurate representation of reported campaign finance activity. For the 2024 cycle, 196,175 documents totaling 164,502,936 pages were reviewed, a 36 percent and 1,000 percent increase, respectively, when compared to the 2008 presidential election cycle.

The FEC provides the public access to reported campaign finance data on the agency's website and directly through the FEC's API, which permits users to customize their own data searches.[3] Public interest in the FEC's campaign finance data continues to grow, with the FEC's campaign finance data API receiving over 648 million hits during the 2024 cycle, representing a 59 percent increase over the number of API hits received during the 2020 presidential election cycle. These trends in the public's interest in campaign finance activity illustrate both how crucial it is for the agency to continue efforts to support and secure access to this data and how challenging it is to do so without additional funding for staff and tools necessary to receive and process campaign finance reports, review the reports for accuracy and compliance and ensure the resulting data continues to be readily available to meet the public's needs despite the significant growth in the volume of data maintained by the agency.

The FEC is undertaking several multi-year IT modernization projects to update the agency's systems and data processing capabilities to use cloud-native architecture, improve services provided to the public and better ensure the security of the FEC's networks, systems and data. Specifically, three IT modernization projects in particular are indispensable components of the FEC's long-term strategy to meet the increase in both reported transactions and public demand for this data:

- eFiling modernization, which includes efforts to modernize the FEC's eFiling software (FECfile+) as well as the completed migration of the eFiling System Infrastructure to the cloud.
- The modernization of the campaign finance data pipeline; and
- The modernization of legacy applications migrated to the cloud during previous fiscal years, including those that support the critical tasks of data review, management workflow and the voting and certifications system used by the Commission.

Modernizing and refactoring the agency's legacy applications, systems and data pipeline will help the FEC streamline the processing of information provided to the public while at the same time improving the systems and tools used by agency staff to provide services to the public and ensure compliance with the campaign finance law.

In 2024, the FEC completed its transition from physical data centers to a cloud-based environment, enhancing system performance and resilience while significantly reducing costs. Without this migration, processing and managing the agency's rapidly growing data assets would have been far more expensive. The FEC is proactively managing these cloud hosting costs through strategies such as reserved instances and pre-paid savings plans, ensuring adequate funding for timely data processing and application operations. As data volumes continue to grow, overall cloud hosting costs are expected to rise. If cloud hosting costs for data and legacy application support exceed available funding and staffing, the agency may face challenges in processing data on time to meet statutory requirements or may need to make difficult decisions regarding the modernization of legacy systems that are 20 to 30 years old.

Challenge 5: Outdated Statutory Pay Structure

Commissioner Pay

[3] The FEC's API, OpenFEC, also supports the data access available through FEC.gov.

As identified by the OIG, the FEC Commissioners are currently compensated at level IV of the Executive Schedule (EX) as specified in FECA. The full compensation for this level in 2025 is $195,200. However, the compensation for certain political appointees, including Members of the FEC, has been frozen. A pay freeze has been in effect since 2014, which set commissioner pay at 2013 levels. As a result of the Obama Administration's action, those 2013 levels were frozen at 2010 rates. A small adjustment was made in 2019, which set the frozen pay level at $158,500, or 18.8 percent less than the full amount. EX salaries are uniform nationwide, while the General Schedule (GS) salaries include locality adjustments. The relatively high cost of living in the Washington, D.C. region means that salaries at the top of the GS scale applicable to FEC employees have outpaced frozen salaries on the EX scale. Thus, the pay freeze exacerbates a salary discrepancy where commissioners receive less compensation than FEC employees in Senior Level (SL) positions, and less compensation than some agency employees in the GS-14 and GS-15 positions, including many of their direct reports. Under these circumstances, it may be difficult to find individuals willing to serve as FEC commissioners in the future, and recruitment will be limited to a smaller pool of potential commissioners due to this salary constraint. While FEC Management is not responsible for recruiting potential commissioners, the lack of quorum that results from three or more vacant commissioner seats is identified as a very high risk for the FEC in the agency's FY 2025 Enterprise Risk Management Risk Profile. Indeed, the FEC lost its quorum of four commissioners on May 1, 2025, and with the departure of an additional commissioner on October 3, 2025 lost its bipartisan representation and is no longer able to perform any of the administrative tasks outlined in the FEC's Directive 10, Rules of Procedure of the Federal Election Commission Pursuant to 2 U.S.C. 437c(e) from 2007.[4]

The Commission approved a Legislative Recommendation in 2024 proposing to amend FECA to increase Commissioners' compensation to Executive Schedule Level II.

Salary Structure (Staff Director and General Counsel)

Section 306 of FECA links salaries to Level IV and Level V of the Executive Schedule for the Staff Director and General Counsel. Both positions supervise personnel at the GS-15 and Senior Level pay scales, which often provide higher salaries than Levels IV and V of the Executive Schedule. The Commission approved a Legislative Recommendation in 2024 proposing to remove the statutory references to the Executive Schedule and amend FECA to specify that the Staff Director and General Counsel would be compensated under the same schedule as the Commission's other senior managers. This revision would remedy the current situation where the Commission's top managers are compensated at a lower rate than many of their direct reports and will ensure that the Commission can retain highly qualified individuals to serve in those positions as well as enable it to remain competitive in the marketplace for Federal executives when vacancies arise.

Management continues to fully support the Commission's ongoing efforts to change the salary structure for key leadership positions of Staff Director and General Counsel. Meanwhile, the Commission has implemented interim solutions for these positions that, very importantly, have

[4] Challenges posed by the loss of quorum are discussed in greater detail in Managements' response to Challenge 1: Loss of Quorum and Loss of Bipartisan Membership.

allowed the Commission to maintain consistency and needed stability in its two most senior staff leadership positions. Moreover, the Commission has been able to continue to receive the services of agency leaders who were selected for these positions after substantial experience working in positions of significant responsibility for the FEC. Instability in these positions has been the subject of prior management challenges identified by the OIG, and the Commission attributes the stability in these positions that has been achieved to the use of the interim solutions.

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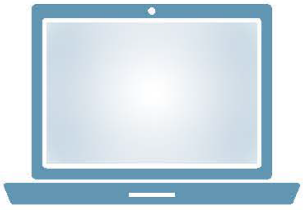

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