

FEDERAL ELECTION COMMISSION

FISCAL YEAR 2026

CONGRESSIONAL BUDGET JUSTIFICATION



May 30, 2025

Concurrently submitted to Congress and the Office of Management and Budget

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Summary of FY 2026 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) 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 the public has 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) 2026 Budget Submission, FEC's requested funding level is \$75.8 million.³ This estimate represents a 6.7 percent decrease from the FY 2025 enacted level of \$80.9 million. The FEC has experienced several years of essentially flat funding, representing a decline in real terms, for FEC operations. During that same period, campaign finance filing activity has increased nearly fivefold. The requested FY 2026 funding level will continue reductions to staffing levels from FY 2024, resulting in a projected 21 percent decrease in employees on board by the end of the fiscal year. The FEC has continued to meet its statutory obligations to the public—despite reduced staffing and increasing campaign finance activity—by improving technology and processes, among other efficiencies.

Pursuant to its authority as a concurrent submission agency⁴, the FEC seeks \$75.8 million in this Budget Justification. This is \$5 million higher than the \$70.8 million included in the proposal from the Office of Management and Budget (OMB) but would be a reduction from FY 2025 of more than six percent in recognition of the Administration's priority to reduce Federal government spending. The requested amount would allow for a required repayment to the Technology Modernization Fund (TMF) of the U.S. General Services Administration, provide \$5 million of additional funding for information technology (IT) services and represent a 19 percent reduction from the agency's initial request in the fall of 2024. OMB's proposed amount for the FEC would be a reduction of more than 12 percent from the FEC's FY 2025 amount.

Limiting the FEC funding as proposed by OMB would put at risk the ability of the FEC to meet its mission and statutory requirements. With funding at that level, the continuation of current IT services, including those used by the public on FEC.gov, would be in serious jeopardy and all three IT

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 With three Commissioners currently serving on the Commission, it lacks a quorum of four Commissioners. Nonetheless, FECA and [FEC Directive 10](#) permit the submission of budget justifications pursuant to a bipartisan majority vote of current Commissioners. The three Commissioners unanimously approved this submission.

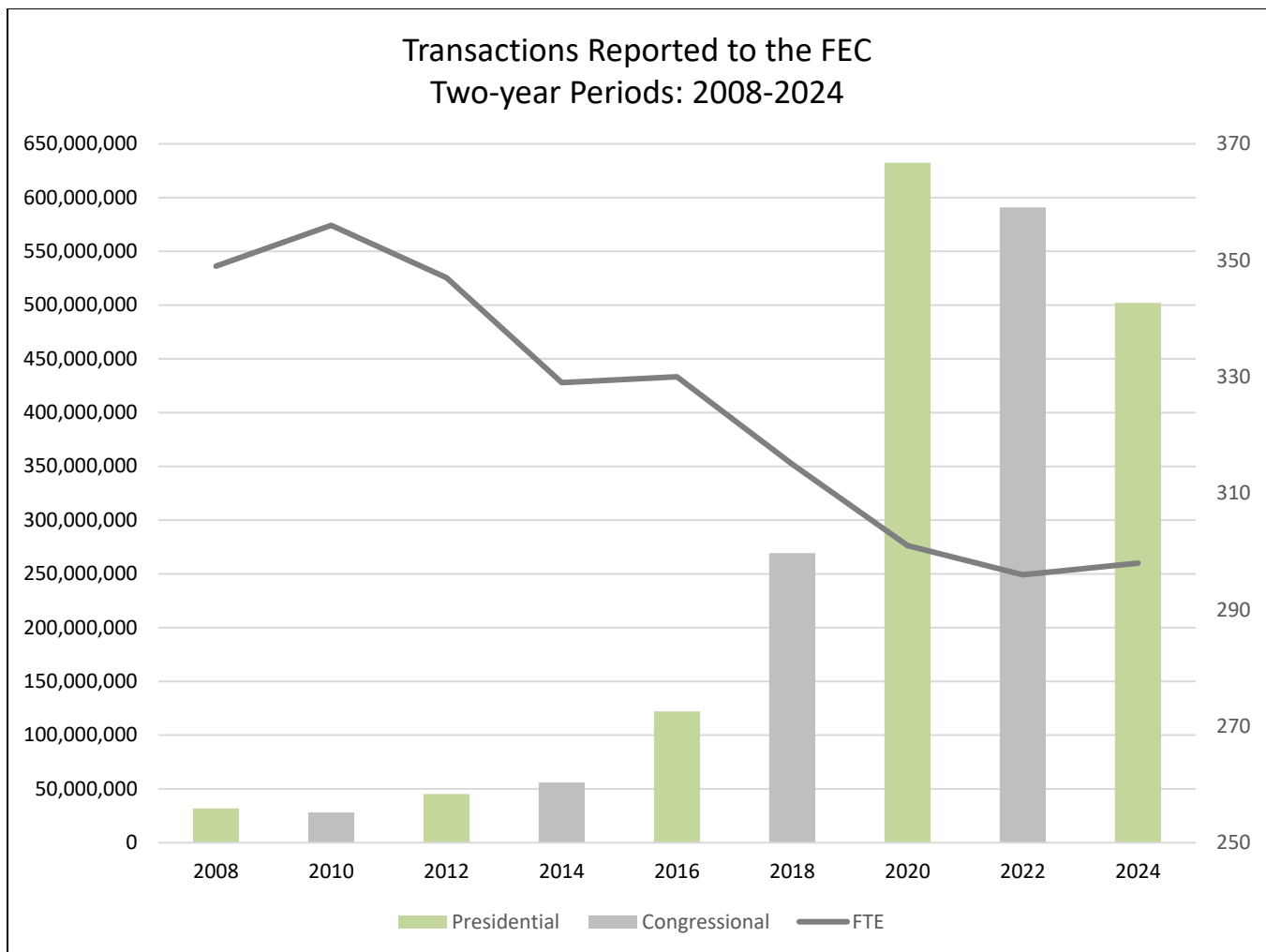
⁴ See FECA § 307(d)(1), 52 U.S.C. § 30107(d)(1).

modernization projects planned by the agency would need to be stopped or paused, which would incur additional costs. This includes continuing development of FECFile+, a modern, web-based version of the agency's free electronic filing software. This project began in FY 2021, and it received a grant from TMF in FY 2024. In this request, the FEC seeks an additional \$5 million for IT services so that the agency may continue current IT services and fund work to modernize the agency's electronic filing software.

To ensure the agency can continue to meet its mission and statutory obligations in FY 2026, the FEC's requested funding level of \$75.8 million includes \$5 million in funds for IT contracts and services not included by OMB. Without this funding for IT contracts and services, the FEC will significantly reduce the level of service the agency provides to filers and the public in FY 2026 and will put at risk the ability of the FEC to meet its mission and statutory requirements.

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

Changes in the way political committees raise and spend funds have contributed to this stark increase in the number of transactions disclosed 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. The chart below illustrates the growth of data transactions, and a concurrent decrease in staffing levels, that the FEC needs to process, store, search and display to support the FEC's disclosure mission.



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.⁵ 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.

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 and the eFiling System Infrastructure;

⁵ The FEC’s API, OpenFEC, also supports the data access available through FEC.gov.

- 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 and management workflow and the voting and certification system used by the Commission.

The requested funding level of \$75.8 million would provide FY 2026 funding necessary for modernizing the agency's eFiling software. In 2021, the FEC began building FECFile+, a modern, web-based version of the agency's free electronic filing software. The current version, originally released in 1997, can only be used via a Windows desktop computer, is difficult to secure and is not compatible with many modern devices. In 2024, TMF agreed to invest \$8.8 million with a 50 percent pay-back rate to help the agency finance the project, which is ongoing. At OMB's proposed funding amount of \$70.8 million, all three IT modernization projects listed above would be paused or stopped.

The requested level of \$75.8 million would support an estimated 245 employees by the end of FY 2026, representing a nearly 33 percent decrease in staffing levels over the past 15 years. With this reduced funding, the agency is developing plans for workforce reshaping and other measures that can be implemented in FY 2026 to strive to meet the agency's statutory requirements. The FEC will continue to focus its efforts on attempting to fulfill the agency's statutory requirements but has in several instances reduced services and significantly reduced performance targets for FY 2026 to better reflect what it can accomplish at these projected staffing levels.

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 FECA's limits, prohibitions, and disclosure provisions. Because of the large and rising number of political committees and the growing number of financial disclosure reports filed with the FEC, voluntary compliance is essential to enforcing the requirements of FECA. Accordingly, the Commission devotes considerable resources to encouraging voluntary compliance through educational materials related to Federal campaign finance laws.

This Budget Justification is organized in three sections. Section 1 addresses the agency's purpose and priorities in FY 2026. 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 2026.

Section 1: Purpose and Priorities in FY 2026

1A: Commission Overview and Future Outlook

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

The FEC is directed by six Commissioners, who are appointed by the President with the advice and consent of the Senate. By law, no more than three Commissioners can be members of the same political party. The Commissioners meet regularly to formulate policy and to vote on significant legal and administrative matters. FECA requires the affirmative vote of four members of the Commission to approve official actions, thus requiring bipartisan decision making.⁶

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

The FEC's Strategic Plan for FY 2022 through FY 2026, developed pursuant to the Government Performance and Results Act of 1993 (GPRA)⁷ and the GPRA Modernization Act of 2010,⁸ 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.

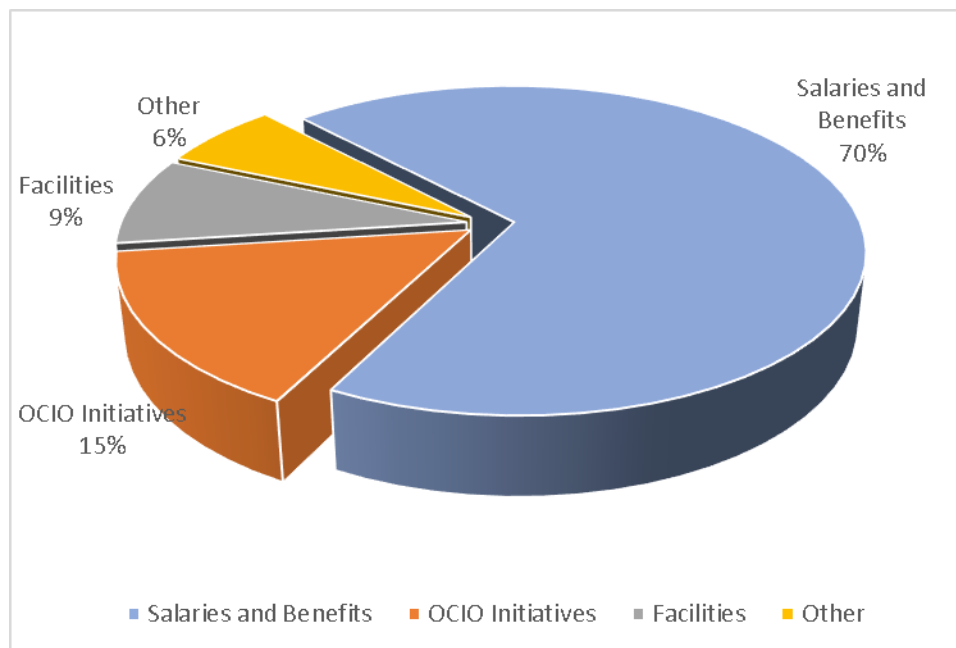
The FEC is currently funded by a single annual appropriation for salaries and expenses. Seventy percent of the agency's budget is composed of salaries and benefits. Of the agency's remaining operational expenses, the largest categories are IT operations, including IT security requirements, and facilities rent. These three requirements constituted 94 percent of the agency's FY 2026 obligations. FY 2026 Budget obligations are shown in Figure 1 below.

⁶ See footnote 3, *supra*.

⁷ Public Law 103-62, 107 Stat. 285 (1993) (*codified at* 31 U.S.C. § 1115 *et seq.*).

⁸ Public Law 111-352, 124 Stat. 3866 (2011) (*codified at* 31 U.S.C. §§ 1115-24).

Figure 1 – FY 2026 Major Categories by Budget

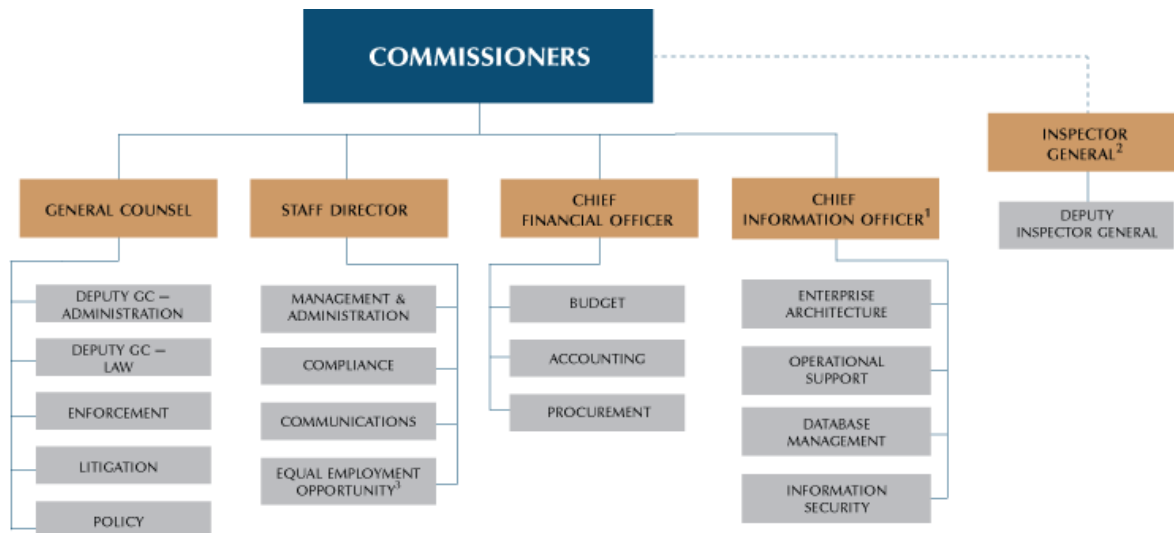


* OCIO Initiatives includes costs for (1) maintenance of all existing applications and systems that support the FEC’s statutory duties, including the legacy eFiling program; (2) IT modernization initiatives; (3) funding of cloud hosting costs, and (4) contracts for products and services associated with maintaining the FEC’s defenses against cybersecurity threats.

FEC Organizational Chart

The Offices of the Staff Director, General Counsel, Chief Information Officer and Chief Financial Officer support the agency in accomplishing its mission. The Office of the Inspector General, established within the FEC in 1989 under the Inspector General Act Amendments of 1988,⁹ is independent and reports both to the Commissioners and to Congress. The specific roles and responsibilities of each office are described in greater detail at:

<https://www.fec.gov/about/leadership-and-structure/fec-offices/>



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).

⁹ Public Law 100-504, 102 Stat. 2515 (1988).

1B: FY 2026 Priorities

The FEC priorities for FY 2026 are aligned with the agency's FY 2022 to 2026 Strategic Plan and are limited to those needs that will allow the agency to fulfill its mission as required by law. As discussed below, funding at the requested amount for FY 2026 would allow the FEC to continue IT contracts and services at a level comparable to FY 2025 and continue work to develop a new eFiling software. Ensuring the agency can continue to provide IT tools and services to support agency staff will be of particular importance in FY 2026 as the agency targets continued staffing reductions in anticipation of a reduced budget environment.

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

The FEC protects the integrity of the Federal campaign finance process by providing transparency and fairly enforcing and administering Federal campaign finance laws. Fair enforcement and full disclosure of the sources and amounts of campaign funds allow the public to make informed decisions in the political process. Transparency requires that information is not only kept by the FEC but also that it is provided to the public in a way that is intuitive to users and provides the necessary context for understanding how Federal elections are funded. The FEC must make election-related reports and information accessible to the public in a timely, reliable and useful fashion. The Commission is therefore committed to providing the public with access to campaign finance data, compliance information and legal resources. Funding at the requested amount of \$75.8 million would allow the FEC to continue to support IT contracts and services that ensure services are delivered to the public.

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

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

Transaction-level data reported to the FEC is also used by FEC staff to ensure compliance with the FECA. Transaction-level data is reviewed by staff in the Reports Analysis Division (RAD) through its RAD Modules system. Furthermore, other departments within the FEC rely on this data through internal systems designed to support the agency's vital compliance functions. The FEC operates in an environment where data security and integrity are paramount, and the existence of any security risks within a legacy system is a concern that demands modernization. Funding at the \$75.8 million level would allow the FEC to continue operations while maintaining its security posture. However, at this level of funding the FEC would not pursue any IT modernization projects during FY 2026 except continuing eFiling modernization.

An additional \$5 million reduction for FY 2026, as proposed by OMB, would result in a 43 percent reduction in the FEC's IT funding from FY 2025 levels. The Commission is confident that the agency cannot meet its statutory and mission requirements in FY 2026 at a \$70.5 million funding level. While the agency would work to preserve where possible the delivery of mission critical services to the public, a \$5 million reduction in funding for IT contracts and services would leave no feasible path for the agency to fulfill its mission to protect the integrity of the Federal campaign finance process by providing transparency and fairly enforcing and administering Federal campaign finance laws.

Engage and Inform the Public about Campaign Finance Data

The FEC's first strategic objective is to provide the public with information about how candidates for Federal office raise and spend funds. At a \$5 million reduction in funding for IT contracts and services, the agency would significantly reduce its use of cloud hosting services and would shut down its API. As a result, members of the public would no longer be able to search campaign finance data on FEC.gov or through the FEC's API. Images and downloadable raw data files of reports would continue to be available on FEC.gov, but the FEC would not provide access to data tables, data visualizations or the ability to perform complex searches of reported information. Moreover, access to data on FEC.gov would be significantly slowed at all times and disrupted during periods of unusually high usage. Thus, during periods when public interest in FEC data is highest, the data could become unavailable. Access to other content on FEC.gov could be affected as well. As a small agency, the FEC is heavily reliant on partnerships and shared services with other government agencies, such as cloud.gov and search.gov. Were these services to increase in cost or reduce services available, additional aspects of FEC.gov, including the site's global search function and certain text searches, would also be rendered unavailable. Additionally, a reduction in funding for IT contracts and services could impact the FEC's ability to meet its statutory requirement of making reports available to the public within 48 hours of receipt.

With a \$5 million reduction in IT funding the FEC would have no choice but to pause or even stop work to develop new electronic filing software. The agency's current electronic filing software was built in the 1990s, is only compatible with one type of platform (Windows devices) and is increasingly difficult to secure. In 2021, the FEC began building a modern, web-based version of the agency's free electronic filing software to ensure broad compatibility and to meet current security guidelines. In 2024, the TMF agreed to invest \$8.8 million with a 50 percent pay-back rate to help the agency finance the project. The FEC is on track to meet the first set of success metrics for the TMF funded portions of the project and will be required to make its second TMF repayment during FY 2026. However, at a \$5 million reduction in IT funding for FY 2026 the FEC may be forced to pause or stop development despite the availability of remaining TMF funds because the new software relies heavily on data from the FEC's API. Although the cost to develop new eFiling software is currently covered by TMF funding, significant support from FEC staff is also required. Given the FEC's planned staffing reductions and the increased duties for staff to monitor and maintain FEC systems that would no longer have contract support, the agency cannot be assured that it would make progress on eFiling development during FY 2026 or that it would continue to have funds available for TMF repayments. While the agency would take steps to preserve the value of funds already spent on the project, restarting development in the future will unavoidably cost more and further delay bringing new electronic filing software into production. Moreover, the FEC will need to extend the period of time during which it funds operation and maintenance costs associated with its legacy electronic filing system with no long-term benefits provided to the public from these costs and

decreasing public access to the data contained in the filings. The support contract for the legacy eFiling contract would also be reduced with a \$5 million reduction in IT funding, resulting in customer service delays for filers needing technical assistance.

Promote Compliance with FECA

The FEC's second strategic objective is to promote compliance with FECA, in part by reviewing campaign finance reports and ensuring the accuracy of the public record. The same IT services and contracts that support the campaign finance databases and provide data to FEC.gov also support FEC staff's internal review of finance reports and programs aimed at promoting and tracking compliance with filing deadlines, including the Administrative Fines Program (AFP). With a \$5 million reduction in funding for IT contracts, the agency would be unable to timely provide newly filed data to the agency's internal review tools and would be unable to track committees for inclusion in the AFP. This, in turn, would slow RAD's ability to review reports and request clarifications to ensure the accuracy of the public record, and their ability to identify committees that meet AFP criteria. Committees that file those reports, including committees of Members of Congress, would experience delays in being notified of these issues which would also delay their opportunity to respond.

In addition to reducing funding for IT services that provide recently filed data to RAD for review, the FEC could also be required to eliminate the IT contract that supports the applications that allow for the efficient review of these reports by RAD analysts. The loss of these IT contracts and tools, in conjunction with planned staffing reductions, could severely delay the agency's review of campaign finance reports. At the same time, necessary reductions in the IT contract for the tools that allow filers to easily find and contact FEC staff would result in a drastic reduction in the customer service that the Electronic Filing Office and RAD provide to filers.

With a \$5 million reduction in funding for IT contracts and services, the FEC would no longer be able to support the technology that allows the agency to provide live, interactive distance learning opportunities to political committees and the general public. These efforts include regular day-long webinars for candidates, parties and political action committees, as well as topic-based online workshops. Political committees, reporters, students and other groups would also no longer be able to schedule online training sessions with FEC staff. These on-demand presentations and regular webinars have in the past offered an efficient and effective way for alternative dispute resolution and other enforcement respondents to satisfy the terms of their agreements with the agency. At the same time, reductions in IT contracts for the tools that allow members of the public to request educational information and resources from the FEC would significantly slow the FEC's responsiveness to such requests as well as requests for help with electronic filings. The FEC would also lose the ability to livestream Open Meetings of the Commission to YouTube.

Interpret FECA

The FEC's third strategic objective is to interpret campaign finance law with the goal of providing timely legal guidance to the public. The FEC relies on IT contracts to support online access to campaign finance legal resources. At a \$5 million reduction, the agency would need to reduce or eliminate contracts that support the public's ability to search on FEC.gov for advisory opinions, rulemakings and

Matters Under Review (MURs), which are Commission enforcement cases. FEC legal resources are available on FEC.gov via the FEC's API and, as a result, the legal searches on FEC.gov would be rendered unavailable once the API has been turned off. As MURs are not generally included in other legal search systems, these steps would risk significantly curtailing public access to MURs in particular. The FEC continues to maintain legacy search systems for advisory opinions and rulemakings. However, these legacy search systems are maintained via an IT contract that would be reduced or terminated at a \$5 million reduction for IT funding. Given the difficulty in securing and maintaining these legacy systems, the FEC would be required to shut down these systems as well. Without sufficient funding to support the public's access to the FEC's campaign finance legal resources, the FEC could face an untenable situation where FEC staff have access to campaign finance legal resources and closed MUR data that is not similarly available to the public.

Cybersecurity and Disaster Recovery

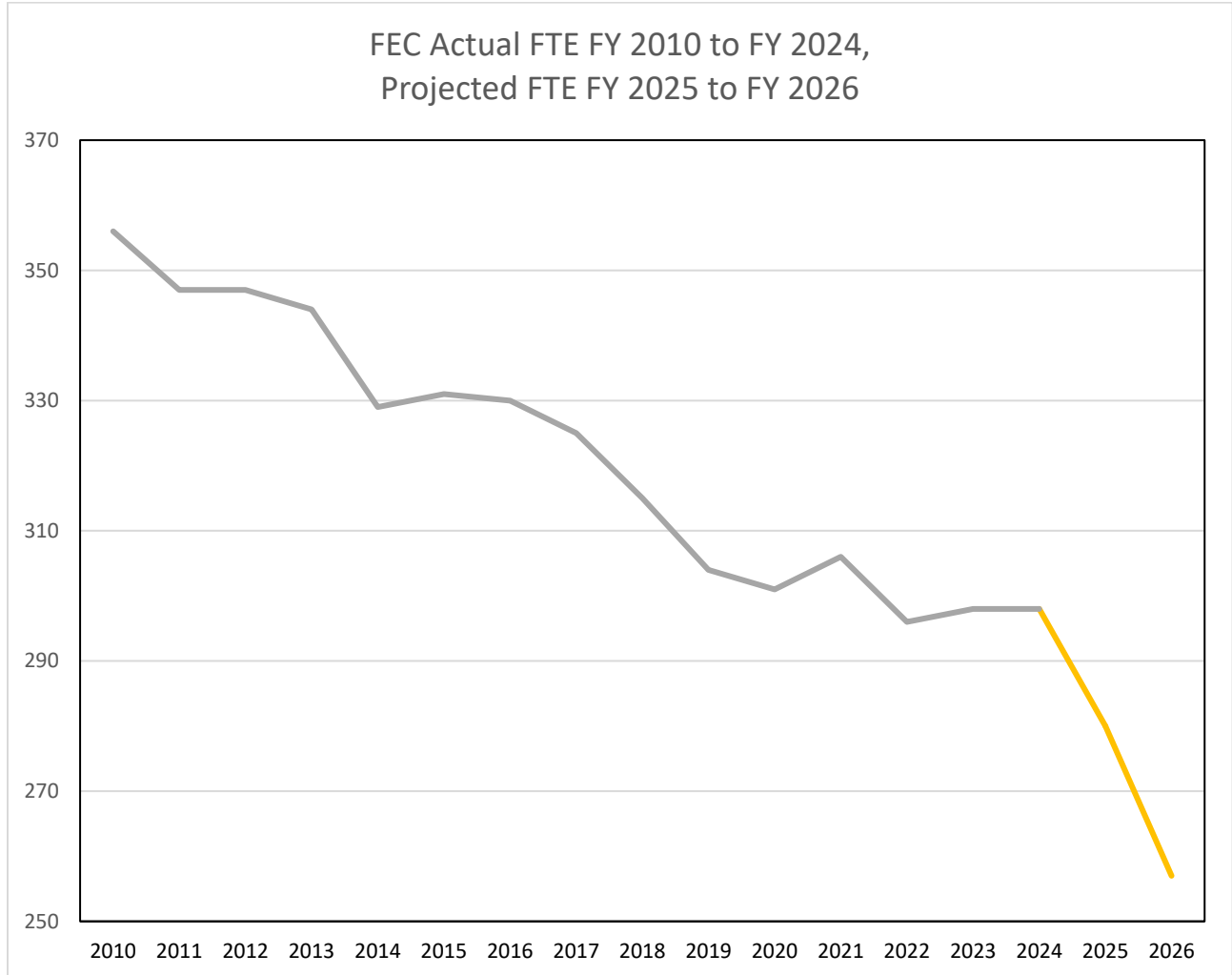
The FEC relies on IT contracts to support its disaster recovery and backups, which are stored in the cloud. With a \$5 million IT reduction, the FEC does not anticipate it would be able to timely recover systems and data in case of a significant disruption. Instead, lack of funding for a disaster recovery (DR) and backup plan could lead to extended outages should an event or disaster occur—turning what is now a 24-hour recovery period into days or weeks.

Finally, the FEC would need to eliminate most of the contracts that support the agency's cybersecurity posture, including our mandated High Value Assets contract, the network monitoring tool and the security operation center. Eliminating these cybersecurity contracts would place the agency at significant risk of cyber intrusions.

Reshaping the Workforce to Achieve the FEC's Mission

The FEC also intends to continue its efforts to maintain the high performance of current staff and the excellent service they provide to the public. Funding at the \$75.8 million level in FY 2026 would support 245 employees by the end of the fiscal year.

Figure 2 – Historic FTE Levels



As illustrated in the chart above, the FEC has experienced steadily decreasing staffing levels. From FY 2010 to present (FY 2024), the FEC reduced the number of employees by 33 percent through attrition while the levels of Federal campaign finance activity, and the resulting workload, increased. During this time, the FEC was able to meet its statutory mission primarily due to efficiencies gained by reassigning staff using details, maximizing operational efficiencies through reorganizations, and improving technology and processes, among other efficiencies. However, in recent years the FEC has begun to exhaust the benefits that can be gained through such efficiencies. Currently, FY 2025 staffing is at the lowest level in recent history, with another 11 percent reduction in staffing projected to be achieved during the remainder of this fiscal year in order to stay within the requested funding level of \$75.8 million for FY 2026. The FEC will continue to focus its efforts on meeting the agency's statutory requirements but has in several instances significantly reduced performance targets to better reflect high performance at projected staffing levels. At this reduced staffing level, the FEC anticipates that it will need to further reduce services across the agency and further adjust performance metrics to reflect the impact of these reduced staffing levels in FY 2026.

Section 2: Budget Overview

2A: Budget Request

Section 2A presents increases and decreases from the FY 2025 appropriation level. The request would reduce staffing to 245 employees by the end of the fiscal year, requiring the agency to reduce services and performance targets. It would also constrain the FEC in its critical modernization efforts.

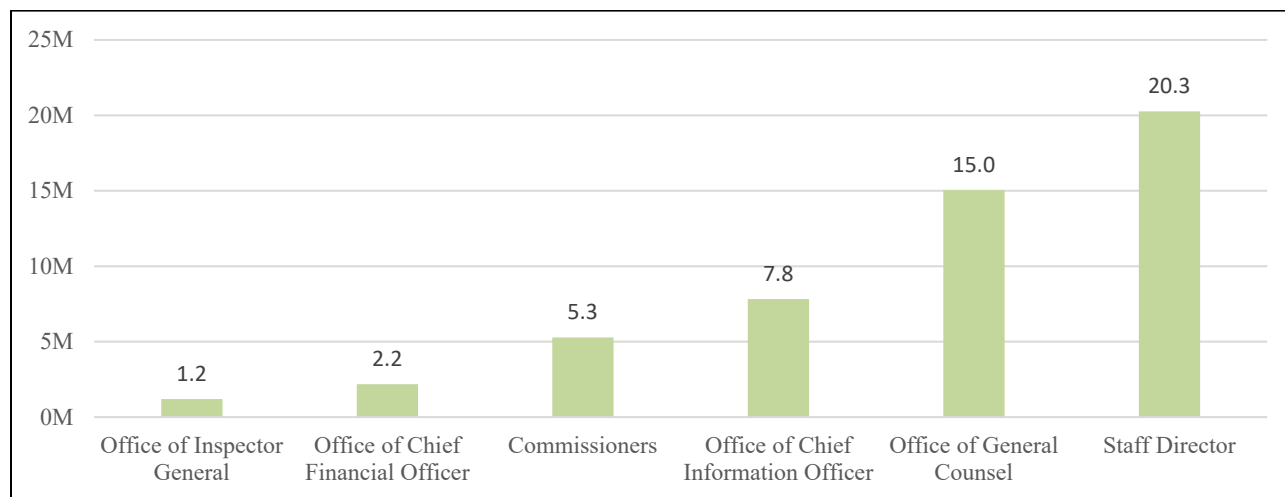
Table 1 Changes from FY 2025 Appropriation to FY 2026 Request

Category	Amount
FY 2025 Appropriation	\$80,857,000
Personnel Changes	
Personnel Compensation and Benefits	(\$5,196,335)
Personnel Changes Subtotal:	(\$5,196,335)
Non-Personnel Changes	
Training	-42,449
Travel	-17,300
Contracts & Other Services	0
Insurance Claims	0
Communications	0
Printing & Reproduction	0
Non-Capitalized & Capitalized Equipment	0
Supplies & Materials	0
IT Contracts	0
Federal Goods & Services	45,673
GSA Rent	118,540
Non-Personnel Changes Subtotal:	\$104,464
Total Change:	(\$5,091,871)
FY 2026 Request	\$75,765,129

Table 2 FY 2026 FEC Congressional Budget Justification

Object Class Data Federal Election Commission		FY 2024 Actual	FY 2025 Appropriation	FY 2026 Request	Change from FY 2025 Appropriation to FY 2026 Request	% Change from FY 2025 Appropriation to FY 2026 Request
11	Personnel Compensation	41,466,850	41,605,259	37,858,966	-3,746,293	-9%
11.52	Cash Awards	644,400	700,000	600,000	-100,000	-14%
12.1	Personnel benefits	15,273,812	15,269,984	13,919,942	-1,350,042	-9%
12.18	Transit Subsidy	100,852	225,000	225,000	0	0%
Subtotal, Personnel		\$57,485,914	\$57,800,243	\$52,603,908	(\$5,196,335)	-9%
21	Travel & transportation	50,776	52,300	35,000	-17,300	-33%
23.1	GSA Rent, Communications	5,837,245	6,159,414	6,277,954	118,540	2%
24	Printing & Reproduction	64,303	85,239	85,239	0	0%
25	Other Services	74,030	95,250	95,250	0	0%
25.11	Training, Commercial Fed. & Tuition	265,351	307,449	265,000	-42,449	-14%
25.14	IT Contracts	8,745,520	9,185,736	9,185,736	0	0%
25.2	Contracts & Other Services	1,425,832	2,013,921	2,013,921	0	0%
25.3	Federal Goods & Services	2,495,753	2,690,641	2,736,314	45,673	2%
26	Supplies and Materials	617,332	511,476	511,476	0	0%
31	Non-Capitalized and Capitalized Equipment	3,343,861	1,905,331	1,905,331	0	0%
42	Insurance Claims	-	50,000	50,000	0	0%
Subtotal, Non-Personnel		\$22,920,003	\$23,056,757	\$23,161,221	\$104,494	0%
TOTAL		\$80,405,917	\$80,857,000	\$75,765,129	(\$5,091,871)	-6%

Table 3 FY 2026 Estimated FEC Personnel Spend by Division in dollars¹⁰



¹⁰ Assumes full complement of six Commissioners and their staff

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

Total Program Decrease \$-5,091,871

Personnel Decrease \$-5,196,335

At the request level of \$75.8 million, the FEC would further reduce staffing levels from FY 2025. This \$5.2 million reduction will target a staffing level of 245 employees by the end of FY 2026, a 16 percent drop from a high of 293 employees on board in FY 2025. This does not support an annual pay raise but does include funding for awards to promote a strong and incentivized workforce.

Non-Personnel Increases and Decreases \$104,464

GSA Rent \$118,540

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

Federal Goods and Services \$45,673

This level would provide support for scheduled increases in the Federal Protective Service contract

Travel \$-17,300

This reduced level would support minimum travel requirements for in-person audits and litigation.

Training \$-42,449

This reduced level would support minimum training requirements, including agency-wide training, OPM required supervisory training, and individualized training.

2B: Appropriations Language

The FEC proposes the following Appropriations Language for FY 2026.

FEDERAL ELECTION COMMISSION Federal Funds Salaries and Expenses

For necessary expenses to carry out the provisions of the Federal Election Campaign Act of 1971, \$75,765,129, of which not to exceed \$5,000 shall be available for reception and representation expenses.

2C: Recommended Legislative Changes

On December 12, 2024, the Commission approved the 2024 Legislative Recommendations.¹¹ Four of these recommendations represent bold proposals to streamline agency processes, including those for disclosing campaign finance data to the public, and ensure that the agency can operate more effectively and at a lower cost to taxpayers.

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

Establish an Itemization Threshold for Conduit Contributions

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

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

Explanation: Under current law, political committees must report all contributions received but are required to itemize only contributions that have an aggregate amount or value in excess of \$200 within the calendar year (or election cycle, in the case of an authorized committee of a candidate for Federal office).¹² Contributions of less than this amount may be reported as one aggregated transaction of “unitemized contributions,” rather than reporting each contribution separately.

With respect to contributions made by a person that are “in any way earmarked or otherwise directed through an intermediary or conduit,” FECA imposes a reporting requirement on the intermediary or conduit that requires reporting to the FEC both the receipt of the initial contribution as well as the disbursement to the intended recipient.¹³ However, this reporting requirement does not include a threshold for itemization of contributions.

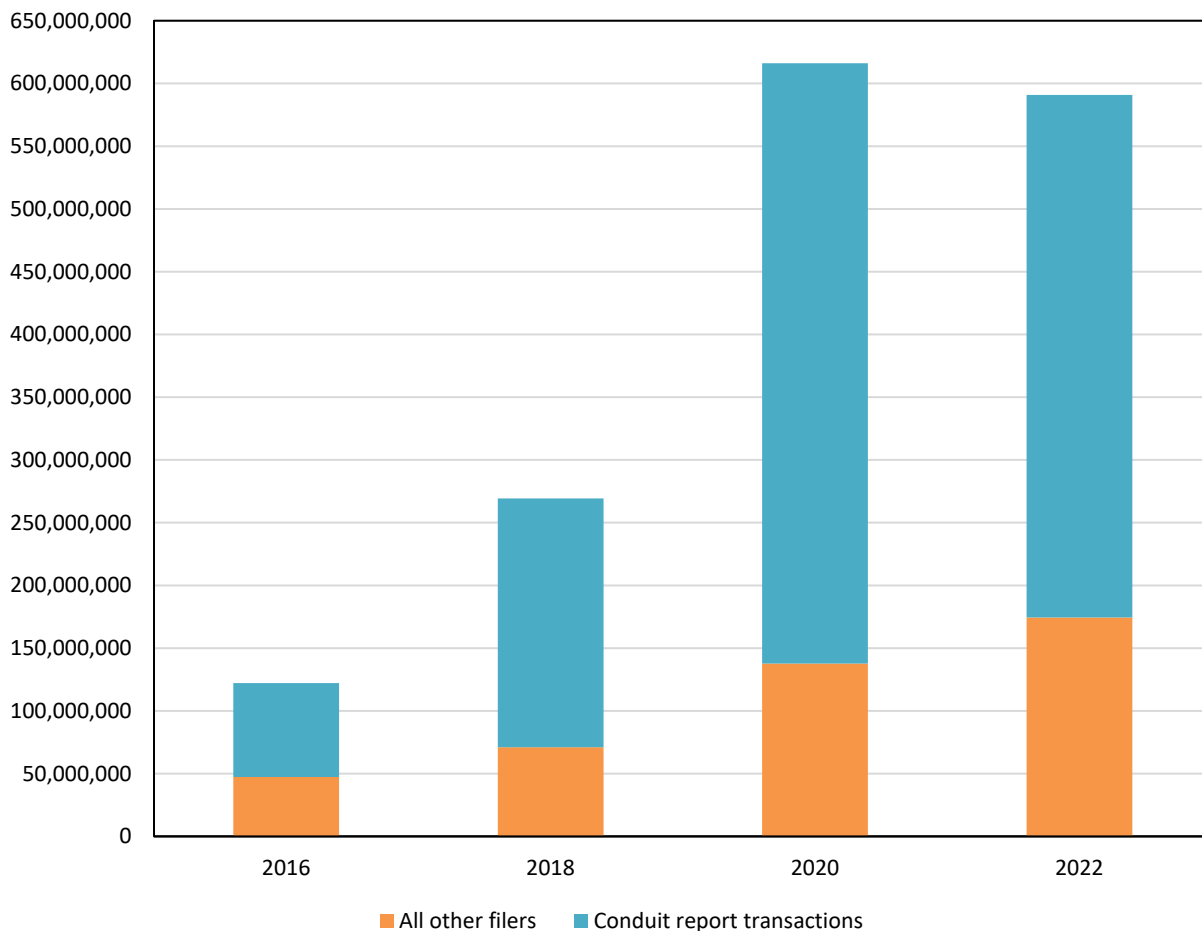
Some contributors who use conduits or intermediaries divide contributions among many intended recipients, which can make some transactions of less than one dollar. Separately reporting transactions of this size can lead to enormous reports with thousands of transactions to disclose a relatively low level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

¹¹ The Commission’s 2024 Legislative Recommendations are available at: <https://www.fec.gov/resources/cms-content/documents/legrec2024.pdf>.

¹² FECA, § 304(b)(3)(A), codified at 52 U.S.C. § 30104(b)(3)(A). FECA also permits committees to choose a lower threshold for reporting contributions received.

¹³ FECA, § 315(a)(8), codified at 52 U.S.C. § 30116(a)(8).

Transactions Reported to the FEC 2016-2022 Election Cycles



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

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

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

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

Explanation:

- Commissioners

The Federal Election Campaign Act provides in section 306(a)(4) that FEC Commissioners are to be paid at Level IV of the Executive Schedule. For 2024, that amount is \$191,900. However, for FEC Commissioners and others, compensation has been subject to a freeze since 2010, with only one adjustment in 2019, which limits the pay for these positions to \$158,500—a 17.4 percent reduction from the current Executive Schedule level. At this current rate, Commissioners receive less compensation than FEC employees in Senior Level positions, less compensation than all agency employees in GS-15 positions, including many of their direct reports. The FEC’s Office of the Inspector General (OIG) expects that the percentage of FEC staff who earn more than FEC Commissioners will approach 46 percent by the end of FY 2026.¹⁴

The OIG identified the pay freeze of the Commissioners’ salary structure as a Human Capital Management challenge for the FEC in 2023, 2024, 2025 and in written testimony and responses to questions for the record submitted in connection with the Committee on House Administration’s September 2023 oversight hearing of the FEC.¹⁵ Finding suitable nominees willing to serve as Members of the FEC will be increasingly difficult the longer the current situation persists. Lapses in having a quorum of Commissioners serving prevent the agency from accomplishing many of its most important functions. An increase in Commissioner compensation may reduce the likelihood of further lapses of a quorum of Commissioners.

The Commission recommends that Congress set the compensation level for FEC Commissioners Executive Schedule Level II. For 2024, that amount is \$183,500. Changing the salaries for Commissioners would not require an increase in the Commission’s appropriation request.

- Staff Director and General Counsel

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

¹⁴ FEC, Office of the Inspector General, *Management and Performance Challenges Facing the FEC for FY 2025* at 13 (Nov. 13, 2024), <https://www.fec.gov/resources/cms-content/documents/FY-2025-Mgmt-Challenges.pdf> (“OIG Challenges 2025”).

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

appointment and retention of these key leaders have been identified as ongoing management and performance challenges to the Commission by the Inspector General in the 10 most recent Agency Financial Reports covering 2014 through 2023 and in previous Performance and Accountability Reports as well as in the Inspector General’s management and performance challenges for FY 2024 and written testimony and responses to questions for the record submitted to the Committee on House Administration.¹⁶ The General Counsel’s position is currently filled on an acting basis.

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

Expand Electronic Filing Requirements

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

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

Explanation: The Treasury and General Government Appropriations Act, 2000,¹⁷ required the Commission to make electronic filing mandatory for political committees and other persons required to file with the Commission who, in a calendar year, have, or have reason to expect to have, total contributions or total expenditures exceeding a threshold amount set by the Commission (which is currently \$50,000). In addition, many independent expenditure reports are already subject to mandatory electronic filing under FECA section 304(a)(11)(A)(i). However, because not all funds required to be reported to the FEC meet the statutory definitions of “contributions” or “expenditures,” the current mandatory electronic filing provision does not apply to Reports of Communication Costs by Corporations and Membership Organizations (FEC Form 7), Notices of Disbursements/Obligations for Electioneering Communications (FEC Form 9), and Reports of Donations Accepted for Inaugural Committees (FEC Form 13).

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

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

¹⁷ Pub. L. No. 106-58, § 639, 113 Stat. 430, 476 (1999).

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

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

Increase and Index for Inflation Limitations, Thresholds and Exemptions

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

Recommendation: Congress should increase and index for inflation certain limitations, thresholds and exemptions in the Federal Election Campaign Act, many of which have not 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 more than twenty years of inflation had effectively reduced FECA's contribution limits in real dollars, the Bipartisan Campaign Reform Act of 2002 (BCRA) increased most of FECA's contribution limits to adjust for some of the effects of inflation. Furthermore, BCRA indexed these limits for inflation to address the impact of future inflation.¹⁸ 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.¹⁹ 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.²⁰ The Commission recommends that Congress increase these thresholds to \$2,000 and then index those amounts for inflation to prevent erosion in the future. Raising this threshold would be particularly beneficial for local and Congressional district committees of political parties. These organizations frequently breach the \$1,000 threshold. An increased threshold would permit limited spending on Federal elections without triggering Federal political committee status for local and Congressional district committees of political parties.

Since 1979, FECA has required persons (other than political committees) who make independent

¹⁸ Bipartisan Campaign Reform Act of 2002, § 307, Pub. L. No. 107-155, 116 Stat. 81, 102-03 (2002).

¹⁹ FECA § 301(4)(A), codified at 52 U.S.C. § 30101(4)(A); see Federal Election Campaign Act of 1971, § 301(d), Pub. L. No. 92-225, 86 Stat. 3, 11 (1972).

²⁰ FECA § 301(4)(C), codified at 52 U.S.C. § 30101(4)(C); see Federal Election Campaign Act Amendments of 1979 (1979 Amendments), Pub. L. No. 96-187, § 101, 93 Stat. 1339, 1340 (1980).

expenditures in excess of \$250 in a calendar year to report such expenditures to the Commission.²¹ The Commission recommends that Congress increase this threshold to \$500 and index this amount for inflation.

Under FECA, an individual may spend up to \$1,000 per candidate, per election and up to \$2,000 per calendar year on behalf of all political committees of the same party for food, beverages, and invitations for an event held in the individual's home without making a contribution.²² FECA also permits an individual to spend up to \$1,000 per candidate, per election and up to \$2,000 per calendar year on behalf of all political committees of the same party for unreimbursed travel expenses on behalf of the campaign or political party without making a contribution.²³

Congress added the current exemption limits in 1979, setting the amount for candidates as the same as the contribution limit then in effect (\$1,000 per election) and setting the amount for political parties as 40 percent of the contribution limit then in effect for state, district, and local parties (\$5,000 per calendar year) and 10 percent of the contribution limit then in effect for national parties (\$20,000).²⁴

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

The 1979 FECA Amendments amended FECA to provide that authorized committees could support only one candidate, with "support" defined to exclude contributions of \$1,000 or less to an authorized committee; thus, a candidate's authorized committees contributions to the authorized committee of another candidate were limited to \$1,000.²⁵ BCRA did not amend this provision of FECA. However, in a 2004 appropriations act, Congress amended this provision of FECA to change the amount to \$2,000.²⁶ This amount, however, was not made subject to adjustment for inflation. Congress should amend FECA to make this \$2,000 limit on authorized committees' contributions to other authorized committees subject to adjustment for future inflation.

The 1976 FECA Amendments added contribution limits for multicandidate political committees and a \$5,000 limit on contributions from all persons other than multicandidate political committees to most political committees.²⁷ The amounts have not been adjusted since 1976, nor are they subject to inflation adjustment. In 2002, BCRA added a \$10,000 contribution limit applicable to contributions from all

²¹ FECA § 304(c)(1), *codified at* 52 U.S.C. § 30104(c)(1); *see* 1979 Amendments, § 104, 93 Stat. at 1354.

²² FECA § 301(8)(B)(ii), *codified at* 52 U.S.C. § 30101(8)(B)(ii).

²³ FECA § 301(8)(B)(iv), *codified at* 52 U.S.C. § 30101(8)(B)(iv).

²⁴ *See* 1979 Amendments, § 101, 93 Stat. at 1340-41.

²⁵ *See* 1979 Amendments, § 102, 93 Stat. at 1346.

²⁶ Consolidated Appropriations Act, 2005, Div. H., § 525, Pub. L. No. 108-447, 118 Stat. 2809, 3271 (Dec. 8, 2004).

²⁷ FECA Amendments of 1976, § 112(2), Pub. Law No. 94-283, 90 Stat. 475, 487 (May 11, 1976).

persons to political committees of state political parties.²⁸ This contribution limit is not subject to adjustment for inflation. Congress should amend FECA to make these contribution limits subject to inflation adjustments.

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

²⁸ Bipartisan Campaign Reform Act of 2002, § 102, Pub. Law No. 107-155, 116 Stat. 81, 87 (Mar. 27, 2002).

Section 3: FY 2026 Agency Performance Plan

3A: Introduction

This Agency Performance Plan (APP) is designed to provide a solid framework for performance planning in accordance with the requirements of the GPRA Modernization Act of 2010. The FY 2026 APP presents performance targets associated with FY 2026.

3A:1 Mission Statement

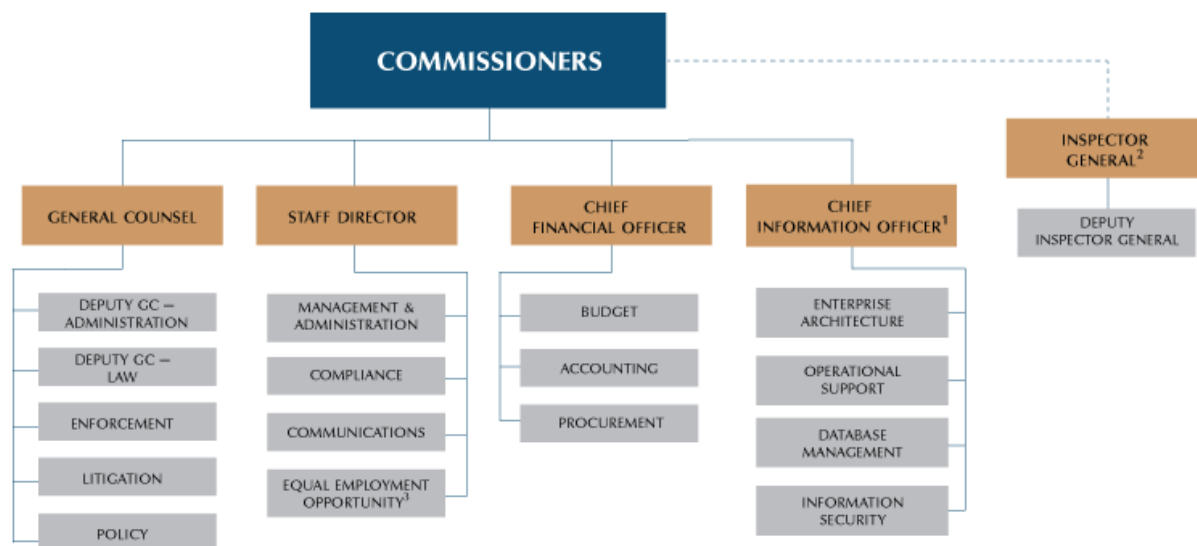
To protect the integrity of the Federal campaign finance process by providing transparency and fairly enforcing and administering Federal campaign finance laws.

3B: Organizational Structure

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

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

To accomplish its legislative mandate, the FEC is directed by six Commissioners, who are appointed by the President with the advice and consent of the Senate. By law, no more than three Commissioners may be members of the same political party. Each member serves a six-year term, and two seats are subject to appointment every two years. Commissioners may serve beyond their six-year terms until new Commissioners are appointed. The position of Commission Chair 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 FECA and meet regularly to formulate policy and to vote on significant legal and administrative matters. FECA requires at least four votes for the Commission to approve certain official actions, thus requiring bipartisan decision-making. The FEC has its headquarters in Washington, D.C. and does not have any regional offices.



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.

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 Commission has identified four strategic objectives to meet the agency’s statutory mission under the Federal Election Campaign Act.

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

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

The FEC protects the integrity of Federal campaigns by providing transparency and fairly enforcing and administering Federal campaign finance laws. Full disclosure of the sources and amounts of campaign funds and fair enforcement of Federal campaign finance laws allow the public to make informed decisions in the political process. Transparency requires that information is not only kept by the FEC but also provided to the public in an easily accessible way. To make certain that campaign finance disclosure information is quickly available and easily accessible to the public, the agency has developed application programming interfaces and other tools to improve access to campaign finance data. The agency is also committed to providing excellent customer service to help the public find and understand campaign finance information.

Strategies and Next Steps

The FEC's eFiling system acts as the point of entry for submission of electronically filed campaign finance reports, providing faster access to reports and streamlining operations. This system provides for public disclosure of electronically filed reports, on FEC.gov, within minutes of being filed. 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.

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

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

- Performance Indicator: Percent of reports processed within 30 days of receipt
- Target: 65 percent
- Time period: October 1, 2025, through September 30, 2026

3C:2.2 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

The FEC places a significant emphasis on promoting 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 below.

Strategies and Next Steps

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 strives to ensure that staff can provide distance learning opportunities to political committees and the general public. These include regular day-long webinars for candidates, parties and political action committees, as well as topic-based online workshops. Political committees, reporters, students and other groups may also schedule live, interactive online training sessions with FEC staff tailored to their specific needs. These on-demand presentations and regular webinars offer an efficient and effective way for alternative dispute resolution and other enforcement respondents to satisfy the terms of their agreements with the agency.

FEC.gov is one of the most important sources of instantly accessible information about FECA, Commission regulations and Commission proceedings. In addition to viewing campaign finance data, anyone with Internet access can use FEC.gov to track Commission rulemakings, search advisory opinions, audits, and closed enforcement matters, view campaign finance data, and find reporting dates. FEC.gov also offers comprehensive compliance information in plain language for candidates, parties and political action committees. 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 offers a variety of instructional videos and tutorials.

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

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

The FEC has exclusive jurisdiction over civil enforcement of Federal campaign finance laws. It consults with the U.S. Department of Justice, as appropriate, on matters involving both civil and criminal enforcement of FECA. Commission enforcement actions, which are handled primarily by the Office of General Counsel (OGC), originate from a number of sources, including external complaints, matters

generated by information ascertained by the Commission in the normal course of carrying out its supervisory responsibilities and referrals from other government agencies. Enforcement matters are handled by OGC pursuant to the requirements of FECA. If the Commission cannot settle or conciliate a matter involving an alleged violation of FECA, the Commission may initiate civil litigation by filing and prosecuting a civil action in Federal district court to address the alleged violation. Closed enforcement matters are available on FEC.gov.

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

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

- Performance Indicator: Educational outreach programs and events achieve targeted satisfaction rating on user surveys
- Target: 3.5 or higher on a 5.0 scale
- Time period: October 1, 2025, through September 30, 2026

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

- Performance Indicator: Of the enforcement matters resolved during the fiscal year, the percentage that was resolved within 15 months of the date of receipt
- Target: 35 percent
- Time period: October 1, 2025, through September 30, 2026

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

Leaders: General Counsel; Deputy General Counsel— Administration

Commission initiatives, Congressional action, judicial decisions, petitions for rulemaking or other changes in campaign finance law may necessitate that the Commission update or adopt new regulations. Consequently, the FEC undertakes rulemakings either to write new Commission regulations or revise

existing regulations. The Commission also provides guidance on how FECA applies to specific situations through the advisory opinion process and represents itself in most litigation before the Federal district and appellate courts. The Commission's three primary means for providing interpretive guidance for FECA and related statutes are discussed below.

Regulations

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

Advisory Opinions

Advisory opinions (AO) are official Commission responses to questions regarding the application of Federal campaign finance law to specific factual situations. FECA generally requires the Commission to respond to AO requests within 60 days. For AO requests from candidates in the two months leading up to an election, FECA requires the Commission to respond within 20 days. The Commission also makes available an expedited process for handling certain other time-sensitive requests. The Commission strives to issue these advisory opinions in 30 days.

Defending Challenges to FECA & Bringing Suit to Enforce FECA

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

Strategies and Next Steps

The Commission considers it a high priority to ensure that guidance is provided through the advisory opinion process within the timeframes established by FECA. The Office of General Counsel continues to ensure that legal guidance is provided within statutory and court-ordered deadlines.

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

- Performance Indicator: Percent of legal guidance provided within statutory and court-ordered deadlines
- Target: 100 percent
- Time period: October 1, 2025, through September 30, 2026

3C:2.4 Objective 4 Foster a Culture of High Performance

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

The FEC's primary measure of success in developing and maintaining a result-driven workforce is at the

program level: a workforce that delivers results will meet the internal performance targets set by the Commission.

Strategies and Next Steps

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

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

- Performance Indicator: Commission-required quarterly updates meet targeted performance goals
- Target: 65 percent
- Time period: October 1, 2025, through September 30, 2026

3D: Implementation Factors

3D:1 Major Management Priorities, Challenges and Risks

Each year the FEC's Inspector General (IG) is required to provide a summary and assessment of the most serious management and performance challenges facing the FEC. In a memorandum dated November 1, 2024, the IG identified four challenges facing management:

- Budget
- Modernization of information systems and cybersecurity
- Growth of election contributions
- Outdated statutory pay structure

The IG's assessment and the FEC's response are included in the FEC's FY 2024 Agency Financial Report, which is available on FEC.gov.

3D:2 Data Validation and Verification

OMB Circular A-136, as revised, and the GPRA Modernization Act of 2010 (GPRAMA) require each agency to describe the accuracy and reliability of the data used to measure progress toward its performance goals, including an identification of the means used to verify and validate the measured values and the source for the data. Agencies are encouraged to determine the appropriate frequency of 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 requests, reports or complaints filed with the Commission. As a result, the universe of data the FEC must collect and verify to support its performance information is generally small, centrally located and easily verified. The FEC tracks data to support its performance measures through its internal databases and with spreadsheets maintained by program managers. In

cases where performance is measured based on the timeframe for completing a decision, matter or inquiry, the universe of data to be measured and the dates on which performance milestones are reached are tracked electronically. Data provided by the agency's litigation, policy, enforcement and compliance offices are reported at least quarterly to the Commission, which provides regular opportunities for the accuracy of the data to be verified.

The FEC also tracks its performance in making campaign finance information available to the public. Reports filed with the FEC represent the largest universe of data the agency must consider in determining its performance. Campaign finance reports and statements filed electronically are made available on FEC.gov nearly instantaneously, and reports and statements filed on paper with the FEC are placed on FEC.gov 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 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 serve as measure managers and data quality leads to ensure completeness, consistency and accuracy of the reported data of their respective strategic activity.

Office of Inspector General's Fiscal Year 2026 Budget Request

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

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

In developing its proposed budget, the OIG has focused on fulfilling the Administration's desire to ensure the highest-quality, most efficient delivery of its statutorily mandated functions. With this in mind, the Inspector General submits the following information regarding the OIG's requested budget for fiscal year 2026:

- \$1,628,000 in the aggregate for the operations of the OIG;
- \$18,000 of that amount for OIG training;²⁹ and
- \$6,500 of that amount to support the CIGIE.³⁰

The OIG notes that the above funding level is a 29 percent decrease from the OIG's FY 2025 request, and is based on the OIG instituting the following cost-saving measures:

- (1) the OIG would not fill the three vacancies it currently has,
- (2) the OIG would continue to obtain legal counsel through an interagency agreement with the Government Publishing Office OIG, and
- (3) the only outside audit for which the OIG would contract is the annual Financial Statement Audit, which is mandated by 31 U.S.C. § 3521.

Note: One result of the third cost-saving measure is that without outside audit support, it is highly likely that the only IT oversight work performed would be the limited IT review that is part of the annual Financial Statement Audit.

At this level of funding, the OIG would focus its resources on using its current limited staff to conduct evaluations and other reviews of the FEC's programs and operations. These engagements would be

²⁹ The professional standards that govern the OIG's work require that most OIG employees must complete 80 hours of Continuing Professional Education (CPEs) every two years. The \$18,000 figure would provide \$3,000 per person to fulfill those requirements. As we have in recent years, the OIG will strive to minimize our training costs and we will of course continue to prioritize free trainings that are offered to the federal oversight community. However, we note that as a result of the Administration's initiative to reduce government spending, many of those free trainings have been canceled.

³⁰ This figure assumes the level of funding that the OIG will be required to provide to CIGIE will continue to be .4 percent of the OIG's budget.

based on the outcome of the OIG's annual risk assessment, which takes into account stakeholder requests and concerns, among other factors.

If Congress would like to see an increase in OIG oversight, the OIG would require an increase of \$90,000 to \$180,000, which would permit the OIG to contract for outside audit support for one to two additional audits. The OIG anticipates that any such outside audit support would focus on IT matters, given the significant IT challenges currently facing the FEC.

I, Susan L. Ruge-Hudson, certify as the FEC Inspector General that the amount I have requested for training satisfies all OIG training requirements for FY 2026.

OIG Summary of Outstanding FEC Audit Recommendations

The Good Accounting Obligation in Government Act requires each agency to include, in its annual budget justification, a report that identifies each public recommendation issued by the agency's Inspector General that has remained unimplemented for one year or more from the annual budget justification submission date. Accordingly, the OIG reports a total of 5 open recommendations with the FY 2026 budget justification.

Report Title	Report Number	Date Issued	Total # of Recs.	# Open Recs. As of March 31, 2025
Inspection of the FEC's Disaster Recovery Plan and Continuity of Operations Plans	OIG-12-06	1/30/2013	30	2
OIG Review of Commission Directive 06	2023-10-001	10/5/2022	1	1
Audit Report of the FEC's Human Capital Management Program for FY2022	OIG-22-02	4/25/2023	5	1
Review of the FEC Travel and Purchase Card Programs	SR-23-02	8/1/2023	5	1
Totals			41	5