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Description of document: Federal Election Commission (FEC) internal assessments and memos regarding the Administrative Fines Program 2017-2022

Requested date: 16-March-2022

Release date: 16-June-2022

Posted date: 07-November-2022

Source of document: FOIA Request  
Federal Election Commission  
Attn: FOIA Requester Service Center  
1050 First Street, NE  
Washington, DC 20463  
Fax: 202-219-1043  
Email: FOIA@fec.gov

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From: FOIA <FOIA@fec.gov>  
Cc: Press <Press@fec.gov>  
Sent: Thu, Jun 16, 2022 2:53 pm  
Subject: Freedom of Information Act Request to the Federal Election Commission (2022-049)  
VIA ELECTRONIC MAIL

Re: Your Freedom of Information Act Request to the Federal Election Commission (2022-049)

This email concerns the request you filed for information under the Freedom of Information Act (FOIA) received by the Federal Election Commission's (FEC) FOIA Requester Service Center on March 16, 2022. Specifically, you requested from January 1, 2017:

"A copy of each FEC internal assessment or internal report or internal study or internal memo regarding the operation of the Commission's Administrative Fines Program."

We have searched our records and located responsive documents. Attached is a 681-page pdf containing records responsive to your request.

These records contain redactions pursuant FOIA Exemption (7)(E), which affords protection to law enforcement information that "would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law." 5 U.S.C. § 552(b)(7)(E). Redactions not otherwise identified encompass distinct records that are not responsive to your request.

Therefore, your FOIA request has been granted in part.

You may contact our FOIA Public Liaison, Christine McClarin, at (202) 694-1485 for any further assistance and to discuss any aspect of your request. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at [ogis@nara.gov](mailto:ogis@nara.gov); telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

You may appeal any adverse FOIA determination. Any such appeal must be filed in writing and should follow the guidelines set forth in 11 C.F.R. § 4.8. If you have any questions, please contact the FOIA Requester Service Center at [FOIA@fec.gov](mailto:FOIA@fec.gov), or (202) 694-1650.

Sincerely,

Steve N. Hajjar  
FOIA Requester Service Center



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 31, 2017

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Lynn Fraser *LF*  
Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Thomas Hintermister *TH*  
Assistant Staff Director  
Audit Division

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2017 - 1st Quarter Highlights (10/1/16 - 12/31/16) & FY Statistical Overview

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2017 JAN 31 PM 12:05

**Administrative Fine Program (Office of Administrative Review)**

During the first quarter of FY 2017, the Commission processed 83 Reason to Believe (RTB) findings. OAR received 15 challenges and processed 11 Reviewing Officer Recommendations (RORs). The Commission made a final determination that the respondents in

31 cases violated 2 U.S.C. § 30104(a) and assessed penalties totaling \$70,530. The Commission also collected \$26,843 in fine payments and prepared 31 cases for public release.

As of January 31, 2017 the Commission has approved a total of 3,064 RTB findings and 2,949 final determination recommendations. The AFP has collected \$4.55 million in 2,435 cases, received 735 challenges, and publicly released 2,918 cases. Of the 735 challenges, the Commission upheld 441 of the RTB findings (60%) with no change in the fine, upheld 120 of the RTB findings (16%) with fines changed, and waived 157 fines (21%). As of January 31, the Commission had not yet made a final determination in the 15 remaining cases.

## (b) (7)(E)

(b) (7)(E)

Additionally, the Office of Administrative Review (OAR) forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

The Reviewing Officer also worked with OCIO and RAD to modify the multiple AF Penalty Calculators pursuant to the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015. The annual adjustments will become effective upon publication in the Federal Register.













# Office of Administrative Review

## **FY 2017 – 1<sup>st</sup> Quarter Highlights**

- Processed 11 Reviewing Officer Recommendations in an average of 50.36 days
- Commission approved 6 Final Determination Recommendations
- \$26,843 in fine payments collected
- Transferred 3 cases to Treasury for debt collection
- Began working with OCFO to modify AF financial reports to accommodate process changes and increase efficiency.
- Collaborated with OCIO and RAD to modify AF penalty calculators for annual inflation adjustments. To become effective upon publication in the Federal Register.

# Office of Administrative Review

## Strategic Plan Performance Measurement: Process 75% of Reviewing Officer Recommendations circulated within 60 days of Challenge Filed Date

FY	2009	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 – 12/31/16)
Challenges Received	67	11	60	11	26	6	35	12	15
Challenges Closed (FD)	67	9	60	10	31	5	32	11	6
Total Processing Days (avg.)	70	38.77	53.15	46.89	29.86	32.5	48.56	58	50.36
Percentage to Goal	60%	100%	100%	100%	93%	100%	97%	81.8%	100%
Fines Assessed (Inclusive of RAD)	\$463,232	\$57,237	\$428,434	\$142,960	\$627,40*	\$139,223	\$290,173	\$133,758	\$70,530
Fines Paid (Inclusive of RAD)	\$388,397	\$90,646	\$344,017	\$101,636	\$540,27*	\$94,171	\$199,948	\$123,838	\$26,843

\*Note: Includes \$191,135 civil money penalty for AF# 2512 (Obama for America) as included in Conciliation Agreement for MURs 6078, 6090, 6108, 6139, 6142 and 6214, and AF# 2512. Includes \$20,000 civil money penalty for AF# 2638 (McCain-Palin Compliance Fund Inc.) as included in Conciliation Agreement for MUR 6112.



## Challenge Review Queue

(Confidential and Sensitive)

AF #	ID	Name	Committee		Report		Reason To Believe		Challenge		Reviewed By Date
					Year	Type	Date	Fine	Rcpt Date	Basis	
3163	C00610113	CARLOS BERUFF FOR SENATE INC			2016	Q3	12/09/2016	\$10,382	12/27/2016	Best Efforts (old regs)	02/25/2017
3212	C00573923	PURSUING AMERICA'S GREATNESS			2016	12G	12/16/2016	\$771	01/09/2017	SA	03/10/2017
3169	C00593103	FRAZIER FOR COLORADO INC			2016	Q3	12/09/2016	\$8,885	01/23/2017	LOA	03/24/2017
3215	C00402826	SAN DIEGO COUNTY DEMOCRATIC PARTY (FED. ACCT.)			2016	12G	12/16/2016	\$8,201	01/23/2017	Committee computer/software/internet issues/Contractor/Vendor Error/History of Compliance	03/24/2017

4 Total Cases to Be Reviewed











































## AF Performance Goals

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Print Date: January 31, 2017

Selected Parameters:

Office: Both

Start Date: 10/01/2016

End Date: 12/31/2016

\*Exception: YES





# AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
<b>Processed</b>						
2016	12G	AUTH	Y	10/27/2016	12/12/2016	
2016	12G	UNAUTH_M	Y	10/27/2016	12/12/2016	
2016	Q3	H_S_P_UNAUTH	N	10/15/2016	12/06/2016	
2016	Q3	H_S_P_UNAUTH	Y	10/15/2016	12/06/2016	
2016	M9	P_UNAUTH	N	09/20/2016	11/15/2016	
2016	M8	P_UNAUTH	N	08/20/2016	10/17/2016	

Total AF Reports Processed 6

Average Processing Days 51.67

(b) (7)(E)

Percentage to Goal 100.00%

## Processed - No committees

Year	Type	Description	Election Sensitive	Due Date	Action Date
2016	12GR	AUTH	Y	11/10/2016	12/12/2016
2016	12SG	AUTH	Y	10/27/2016	12/07/2016
2016	M10	P_UNAUTH	N	10/20/2016	12/07/2016
2016	M10	P_UNAUTH	Y	10/20/2016	12/07/2016
2016	12P	AUTH	Y	09/01/2016	10/27/2016
2016	12SP	AUTH	Y	09/01/2016	10/27/2016
2016	12P	AUTH	Y	08/27/2016	10/20/2016
2016	12P	AUTH	Y	08/18/2016	10/17/2016
2016	12P	AUTH	Y	08/15/2016	10/03/2016
2016	12PR	AUTH	Y	08/15/2016	10/03/2016



# AF Performance Goals

(Confidential and Sensitive)

Total AF Reports Processed-No Committees	10
Average Processing Days	49.30
(b) (7)(E)	
Percentage to Goal	100.00%

Total AF Reports	16
Average Processing Days	50.19
(b) (7)(E)	
Percentage to Goal	100.00%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters  
RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters  
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H  
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



# AF Performance Goals

(Confidential and Sensitive)

## OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2016	Q1	3067	C00432096	09/06/2016	11/02/2016	57	Y
2016	12P	3086	C00559492	09/08/2016	11/03/2016	56	Y
2016	48H	3089	C00592659	10/04/2016	11/16/2016	43	Y
2016	Q2	3118	C00588756	10/24/2016	11/16/2016	23	Y
2016	Q2	3124	C00612929	10/25/2016	12/13/2016	49	Y
2016	Q2	3125	C00607564	10/24/2016	12/15/2016	52	Y
2016	Q2	3128	C00586578	10/25/2016	12/15/2016	51	Y
2016	Q2	3130	C00606897	10/25/2016	12/15/2016	51	Y
2016	Q2	3131	C00565598	10/25/2016	12/20/2016	56	Y
2016	Q2	3138	C00520064	10/31/2016	12/28/2016	58	Y
2016	M7	3140	C00438291	10/31/2016	12/28/2016	58	Y

Total Challenges Processed 11

Average Processing Days 50.36

Total Reports Processed within 60 Days 11

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2017 APR 28 AM 10:28

April 28, 2017

**MEMORANDUM**

**SENSITIVE**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

AGENDA DOCUMENT NO. X17-15

AGENDA ITEM

For meeting of 5-9-17

Lynn Fraser *LF*  
Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Thomas Hintermister *TH*  
Assistant Staff Director  
Audit Division

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2017 – 2nd Quarter Highlights (1/1/17 - 3/31/17) & FY Statistical Overview

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**Administrative Fine Program (Office of Administrative Review)**

During the second quarter of FY 2017, the Commission processed 59 Reason to Believe (RTB) findings. OAR received 3 challenges and processed 7 Reviewing Officer Recommendations (RORs). The Commission made a final determination that the respondents in

34 cases violated 2 U.S.C. § 30104(a) and assessed penalties totaling \$94,588. The Commission also collected \$96,452 in fine payments and prepared 9 cases for public release.

As of April 28, 2017 the Commission has approved a total of 3,153 RTB findings and 2,938 final determination recommendations. The AFP has collected \$4.58 million in 2,465 cases, received 736 challenges, and publicly released 2,928 cases. Of the 736 challenges, the Commission upheld 448 of the RTB findings (60%) with no change in the fine, upheld 122 of the RTB findings (16%) with fines changed, and waived 161 fines (21%). As of January 31, the Commission had not yet made a final determination in the 5 remaining cases.

**(b) (7)(E)**

(b) (7)(E)

Additionally, the Office of Administrative Review (OAR) forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).













# Office of Administrative Review

## **FY 2017 – 2<sup>nd</sup> Quarter Highlights**

- Processed 7 Reviewing Officer Recommendations in an average of 55 days
- Commission approved 9 OAR Final Determination Recommendations
- \$96,452 in fine payments collected
- Transferred 1 case to Treasury for debt collection
- Continued working with OCFO to modify AF financial reports to accommodate process changes and increase efficiency.

# Office of Administrative Review

## Strategic Plan Performance Measurement: Process 75% of Reviewing Officer Recommendations circulated within 60 days of Challenge Filed Date

FY	2009	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 – 3/31/17)
Challenges Received	67	11	60	11	26	6	35	12	18
Challenges Closed (FD)	67	9	60	10	31	5	32	11	15
Total Processing Days (avg.)	70	38.77	53.15	46.89	29.86	32.5	48.56	58	52.17
Percentage to Goal	60%	100%	100%	100%	93%	100%	97%	81.8%	100%
Fines Assessed (Inclusive of RAD)	\$463,232	\$57,237	\$428,434	\$142,960	\$627,40*	\$139,223	\$290,173	\$133,758	\$165,118
Fines Paid (Inclusive of RAD)	\$388,397	\$90,646	\$344,017	\$101,636	\$540,27*	\$94,171	\$199,948	\$123,838	\$166,060

\*Note: Includes \$191,135 civil money penalty for AF# 2512 (Obama for America) as included in Conciliation Agreement for MURs 6078, 6090, 6108, 6139, 6142 and 6214, and AF# 2512. Includes \$20,000 civil money penalty for AF# 2638 (McCain-Palin Compliance Fund Inc.) as included in Conciliation Agreement for MUR 6112.



## Challenge Review Queue

(Confidential and Sensitive)

AF #	ID	Name	Committee		Report		Reason To Believe		Challenge		Reviewed By Date
					Year	Type	Date	Fine	Rcpt Date	Basis	
3234	C00484683	STUTZMAN FOR SENATE			2016	48H	02/21/2017	\$4,588	03/27/2017	LOA	05/26/2017
3269	C00603563	LIBERTY ACTION GROUP			2016	30G	03/29/2017	\$9,290	04/12/2017	FECFile/E FO Support/S A	06/11/2017

2 Total Cases to Be Reviewed



















































## AF Performance Goals

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Print Date: April 28, 2017

Selected Parameters:

Office: Both  
Start Date: 10/01/2016  
End Date: 03/31/2017  
\*Exception: YES



# AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
<b>Processed</b>						
2016	YE	H_S_P_UNAUTH	N	01/31/2017	03/30/2017	
2016	30G	UNAUTH	N	12/08/2016	03/28/2017	
2016	30G	AUTH	N	12/08/2016	01/23/2017	
2016	12G	UNAUTH_Q	Y	10/27/2016	03/20/2017	
2016	12G	AUTH	Y	10/27/2016	12/12/2016	
2016	12G	UNAUTH_M	Y	10/27/2016	12/12/2016	
2016	Q3	H_S_P_UNAUTH	N	10/15/2016	12/06/2016	
2016	Q3	H_S_P_UNAUTH	Y	10/15/2016	12/06/2016	
2016	M9	P_UNAUTH	N	09/20/2016	11/15/2016	
2016	M8	P_UNAUTH	N	08/20/2016	10/17/2016	
Total AF Reports Processed			10			
Average Processing Days			66.80			
(b) (7)(E)						
Percentage to Goal			80.00%			

## Processed - No committees

Year	Type	Description	Election Sensitive	Due Date	Action Date	(b) (7)(E)
2016	30GR	AUTH	N	01/09/2017	03/09/2017	
2016	30GR	AUTH	N	12/22/2016	01/24/2017	
2016	M12	P_UNAUTH	N	12/20/2016	01/24/2017	
2016	30SG	AUTH	N	12/08/2016	01/17/2017	
2016	12GR	AUTH	Y	11/28/2016	01/17/2017	
2016	M11	P_UNAUTH	N	11/20/2016	01/17/2017	
2016	12GR	AUTH	Y	11/10/2016	12/12/2016	
2016	12SG	AUTH	Y	10/27/2016	12/07/2016	
2016	M10	P_UNAUTH	N	10/20/2016	12/07/2016	
2016	M10	P_UNAUTH	Y	10/20/2016	12/07/2016	
2016	12P	AUTH	Y	09/01/2016	10/27/2016	
2016	12SP	AUTH	Y	09/01/2016	10/27/2016	
2016	12P	AUTH	Y	08/27/2016	10/20/2016	



# AF Performance Goals

(Confidential and Sensitive)

## Processed - No committees

					Action Date
2016	12P	AUTH	Y	08/18/2016	10/17/2016
2016	12P	AUTH	Y	08/15/2016	10/03/2016
2016	12PR	AUTH	Y	08/15/2016	10/03/2016

(b) (7)(E)

Total AF Reports Processed-No Committees	16
Average Processing Days	48.00
(b) (7)(E)	
Percentage to Goal	100.00%

Total AF Reports	26
Average Processing Days	55.23
(b) (7)(E)	
Percentage to Goal	92.31%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters  
 RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters  
 processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H  
 sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



# AF Performance Goals

(Confidential and Sensitive)

## OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2016	Q1	3067	C00432096	09/06/2016	11/02/2016	57	Y
2016	12P	3086	C00559492	09/08/2016	11/03/2016	56	Y
2016	48H	3089	C00592659	10/04/2016	11/16/2016	43	Y
2016	Q2	3118	C00588756	10/24/2016	11/16/2016	23	Y
2016	Q2	3124	C00612929	10/25/2016	12/13/2016	49	Y
2016	Q2	3125	C00607564	10/24/2016	12/15/2016	52	Y
2016	Q2	3128	C00586578	10/25/2016	12/15/2016	51	Y
2016	Q2	3130	C00606897	10/25/2016	12/15/2016	51	Y
2016	Q2	3131	C00565598	10/25/2016	12/20/2016	56	Y
2016	Q2	3138	C00520064	10/31/2016	12/28/2016	58	Y
2016	M7	3140	C00438291	10/31/2016	12/28/2016	58	Y
2016	M8	3144	C00496505	11/17/2016	01/12/2017	56	Y
2016	M8	3146	C00544767	11/17/2016	01/12/2017	56	Y
2016	48H	3148	C00266940	11/16/2016	01/11/2017	56	Y
2016	M9	3149	C00496505	11/23/2016	01/12/2017	50	Y
2016	M9	3151	C00544767	11/23/2016	01/12/2017	50	Y
2016	Q3	3163	C00610113	12/27/2016	02/23/2017	58	Y
2016	Q3	3169	C00593103	01/23/2017	03/23/2017	59	Y



# AF Performance Goals

(Confidential and Sensitive)

Total Challenges Processed	18
Average Processing Days	52.17
Total Reports Processed within 60 Days	18
Percentage to Goal	100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION COMMISSION

2017 JUL 31 PM 3: 37

July 31, 2017

**SENSITIVE**

**MEMORANDUM**

AGENDA DOCUMENT NO. X17-23

AGENDA ITEM

For meeting of August 15, 2017

TO: The Commission

THROUGH: Alec Palmer *AWH for*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista Roche *KR*  
Acting Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Thomas Hintermister *TH*  
Assistant Staff Director  
Audit Division

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2017 – 3<sup>rd</sup> Quarter Highlights (4/1/17 - 6/30/17) & FY Statistical Overview

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### **Administrative Fine Program (Office of Administrative Review)**

During the third quarter of FY 2017, the Commission processed 46 Reason to Believe (RTB) findings. OAR received 8 challenges and processed 7 Reviewing Officer Recommendations (RORs). The Commission reviewed final determination recommendations in 60 cases, and made a final determination that the respondents in 54 cases violated 2 U.S.C. § 30104(a) and assessed penalties totaling \$106,251. The Commission also collected \$131,629 in fine payments and prepared 52 cases for public release.

As of July 31, 2017 the Commission has approved a total of 3,164 RTB findings and 3,052 final determination recommendations. The AFP has collected \$4.71 million in 2,507 cases, received 736 challenges, and publicly released 3,068 cases. Of the 744 challenges, the Commission upheld 449 of the RTB findings (60%) with no change in the fine, upheld 124 of the RTB findings (16%) with fines changed, and waived 163 fines (21%). As of July 31, the Commission had not yet made a final determination in the 8 remaining cases.

**(b) (7)(E)**

(b) (7)(E)

Additionally, the Office of Administrative Review (OAR) forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).













# Office of Administrative Review

## **FY 2017 – 3<sup>rd</sup> Quarter Highlights**

- **Processed 7 Reviewing Officer Recommendations in an average of 38.43 days**
- **Commission closed 9 OAR Final Determination Recommendations**
- **\$131,629 in fine payments collected**
- **Transferred 5 cases to Treasury for debt collection**
- **Continued working with OCFO and OCIO to modify AF financial reports to accommodate process changes and increase efficiency. RO is currently performing extensive testing to ensure reports will be ready for use beginning FY18.**

# Office of Administrative Review

## Strategic Plan Performance Measurement: Process 75% of Reviewing Officer Recommendations circulated within 60 days of Challenge Filed Date

FY	2009	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 – 6/30/17)
Challenges Received	67	11	60	11	26	6	35	12	<b>26</b>
Challenges Closed (FD)	67	9	60	10	31	5	32	11	<b>24</b>
Total Processing Days (avg.)	70	38.77	53.15	46.89	29.86	32.5	48.56	58	<b>48.32</b>
Percentage to Goal	60%	100%	100%	100%	93%	100%	97%	81.8%	<b>100%</b>
Fines Assessed (Inclusive of RAD)	\$463,232	\$57,237	\$428,434	\$142,960	\$627,40*	\$139,223	\$290,173	\$133,758	<b>\$271,369</b>
Fines Paid (Inclusive of RAD)	\$388,397	\$90,646	\$344,017	\$101,636	\$540,27*	\$94,171	\$199,948	\$123,838	<b>\$226,143</b>

\*Note: Includes \$191,135 civil money penalty for AF# 2512 (Obama for America) as included in Conciliation Agreement for MURs 6078, 6090, 6108, 6139, 6142 and 6214, and AF# 2512. Includes \$20,000 civil money penalty for AF# 2638 (McCain-Palin Compliance Fund Inc.) as included in Conciliation Agreement for MUR 6112.



# OAR Challenge Queue

(Confidential and Sensitive)

AF #	Committee		Report		Reason To Believe		Challenge		Reviewed By Date	ROR Circ Date	Days to Review
	ID	Name	Year	Type	Date	Fine	Rcpt Date	Basis			
3234	C00484683	STUTZMAN FOR SENATE	2016	48H	02/21/2017	\$4,588	03/27/2017	CE	05/26/2017	07/06/2017	101
3269	C00603563	LIBERTY ACTION GROUP	2016	30G	03/29/2017	\$9,290	04/12/2017	FECFile/E FO Support/S A	06/11/2017	06/09/2017	58
3304	C00603563	LIBERTY ACTION GROUP	2016	YE	04/03/2017	\$6,735	05/01/2017	FECFile/E FO Support/S A	06/30/2017	06/09/2017	39
3302	C00622555	JOHN CARROLL FOR US SENATE 2016	2016	YE	04/03/2017	\$1,176	05/08/2017	LOA	07/07/2017	05/26/2017	18
3298	C00610808	FRIENDS OF PAM TUCKER	2016	YE	04/03/2017	\$3,751	05/15/2017	LOA	07/14/2017	05/31/2017	16
3319	C00608737	COMMITTEE TO ELECT MARK A. HUNT FOR CONGRESS 2016	2016	48H	04/20/2017	\$7,048	05/31/2017	LOA/Not Required to File	07/30/2017	07/28/2017	58
3324	C00578344	LORETTA SANCHEZ FOR SENATE	2016	48H	04/28/2017	\$4,043	06/05/2017	LOA	08/04/2017		
3325	C00459255	FRIENDS OF TODD YOUNG, INC.	2016	48H	04/28/2017	\$3,833	07/07/2017	Contractor/ Vender Error	09/05/2017		

8 Total Cases to Be Reviewed

Average Review TAT 48



























































## AF Performance Goals

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Print Date: July 31, 2017

Selected Parameters:

Office: Both

Start Date: 10/01/2016

End Date: 06/30/2017

\*Exception: YES



# AF Performance Goals

(Confidential and Sensitive)

## RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
<b>Processed</b>						
2016	YE	H_S_P_UNAUTH	N	01/31/2017	03/30/2017	
2016	30G	UNAUTH	N	12/08/2016	03/28/2017	
2016	30G	AUTH	N	12/08/2016	01/23/2017	
2016	12G	UNAUTH_Q	Y	10/27/2016	03/20/2017	
2016	12G	AUTH	Y	10/27/2016	12/12/2016	
2016	12G	UNAUTH_M	Y	10/27/2016	12/12/2016	
2016	Q3	H_S_P_UNAUTH	N	10/15/2016	12/06/2016	
2016	Q3	H_S_P_UNAUTH	Y	10/15/2016	12/06/2016	
2016	M9	P_UNAUTH	N	09/20/2016	11/15/2016	
2016	M8	P_UNAUTH	N	08/20/2016	10/17/2016	
2017	M4	P_UNAUTH	N	04/20/2017	06/12/2017	
2017	Q1	H_S_P	N	04/15/2017	06/12/2017	
2017	M3	P_UNAUTH	N	03/20/2017	05/10/2017	
2017	M2	P_UNAUTH	N	02/20/2017	04/18/2017	

Total AF Reports Processed 14

Average Processing Days 63.36

(b) (7)(E)

Percentage to Goal 85.71%

### Processed - No committees

Year	Type	Description	Election Sensitive	Due Date	Action Date	(b) (7)(E)
2016	30GR	AUTH	N	01/09/2017	03/09/2017	
2016	30GR	AUTH	N	12/22/2016	01/24/2017	
2016	M12	P_UNAUTH	N	12/20/2016	01/24/2017	
2016	30SG	AUTH	N	12/08/2016	01/17/2017	
2016	12GR	AUTH	Y	11/28/2016	01/17/2017	
2016	M11	P_UNAUTH	N	11/20/2016	01/17/2017	
2016	12GR	AUTH	Y	11/10/2016	12/12/2016	
2016	12SG	AUTH	Y	10/27/2016	12/07/2016	
2016	M10	P_UNAUTH	N	10/20/2016	12/07/2016	



# AF Performance Goals

(Confidential and Sensitive)

## Processed - No committees

						Action Date	(b) (7)(E)
2016	M10	P_UNAUTH	Y	10/20/2016	12/07/2016		
2016	12P	AUTH	Y	09/01/2016	10/27/2016		
2016	12SP	AUTH	Y	09/01/2016	10/27/2016		
2016	12P	AUTH	Y	08/27/2016	10/20/2016		
2016	12P	AUTH	Y	08/18/2016	10/17/2016		
2016	12P	AUTH	Y	08/15/2016	10/03/2016		
2016	12PR	AUTH	Y	08/15/2016	10/03/2016		
2017	12SPR	AUTH	Y	05/04/2017	06/29/2017		
2017	30SG	AUTH	N	05/04/2017	06/29/2017		
2017	12SP	AUTH	Y	04/20/2017	06/12/2017		
2017	12SG	AUTH	Y	04/06/2017	06/01/2017		
2017	12SG	AUTH	Y	03/30/2017	05/18/2017		
2017	12SG	AUTH	Y	03/23/2017	05/18/2017		

Total AF Reports Processed-No Committees	22
Average Processing Days	49.73
(b) (7)(E)	
Percentage to Goal	100.00%

Total AF Reports	36
Average Processing Days	55.03
(b) (7)(E)	
Percentage to Goal	94.44%



# AF Performance Goals

**(Confidential and Sensitive)**

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters

RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters

processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H  
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.





# AF Performance Goals

(Confidential and Sensitive)

OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2016	Q1	3067	C00432096	09/06/2016	11/02/2016	57	Y
2016	12P	3086	C00559492	09/08/2016	11/03/2016	56	Y
2016	48H	3089	C00592659	10/04/2016	11/16/2016	43	Y
2016	Q2	3118	C00588756	10/24/2016	11/16/2016	23	Y
2016	Q2	3124	C00612929	10/25/2016	12/13/2016	49	Y
2016	Q2	3125	C00607564	10/24/2016	12/15/2016	52	Y
2016	Q2	3128	C00586578	10/25/2016	12/15/2016	51	Y
2016	Q2	3130	C00606897	10/25/2016	12/15/2016	51	Y
2016	Q2	3131	C00565598	10/25/2016	12/20/2016	56	Y
2016	Q2	3138	C00520064	10/31/2016	12/28/2016	58	Y
2016	M7	3140	C00438291	10/31/2016	12/28/2016	58	Y
2016	M8	3144	C00496505	11/17/2016	01/12/2017	56	Y
2016	M8	3146	C00544767	11/17/2016	01/12/2017	56	Y
2016	48H	3148	C00266940	11/16/2016	01/11/2017	56	Y
2016	M9	3149	C00496505	11/23/2016	01/12/2017	50	Y
2016	M9	3151	C00544767	11/23/2016	01/12/2017	50	Y
2016	Q3	3163	C00610113	12/27/2016	02/23/2017	58	Y
2016	Q3	3169	C00593103	01/23/2017	03/23/2017	59	Y
2016	Q3	3171	C00581926	02/13/2017	04/13/2017	59	Y
2016	12G	3249	C00558452	05/04/2017	06/29/2017	56	Y
2016	30G	3269	C00603563	04/12/2017	06/09/2017	58	Y
2016	YE	3298	C00610808	05/15/2017	05/31/2017	16	Y
2016	YE	3302	C00622555	05/08/2017	05/26/2017	18	Y
2016	YE	3304	C00603563	05/01/2017	06/09/2017	39	Y



# AF Performance Goals

(Confidential and Sensitive)

2016	YE	3312	C00607762	05/08/2017	05/31/2017	23	Y
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Total Challenges Processed	25
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Average Processing Days	48.32
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Total Reports Processed within 60 Days	25
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Percentage to Goal	100.00%
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OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

**SENSITIVE**

AGENDA DOCUMENT NO. X17-38

AGENDA ITEM

For meeting of 11-7-17



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 31, 2017

RECEIVED  
FEDERAL ELECTION COMMISSION  
2017 OCT 31 AM 11:36

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer *PCO for AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista Roche *KR*  
Acting Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Thomas Hintermister *TH*  
Assistant Staff Director  
Audit Division

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2017 – 4<sup>th</sup> Quarter Highlights (7/1/17 - 9/30/17) & FY Statistical Overview

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### **Administrative Fine Program (Office of Administrative Review)**

During the fourth quarter of FY 2017, the Commission processed 15 Reason to Believe (RTB) findings. OAR received 3 challenges and processed 5 Reviewing Officer Recommendations (RORs). The Commission reviewed final determination recommendations in 76 cases, and made a final determination that the respondents in 75 cases violated 2 U.S.C. § 30104(a) and assessed penalties totaling \$176,120. The Commission also collected \$20,103 in fine payments and prepared 76 cases for public release.

As of October 31, 2017 the Commission has approved a total of 3,136 RTB findings and 3,065 final determination recommendations. The AFP has collected \$4.74 million in 2,528

cases, received 747 challenges, and publicly released 3,055 cases. Of the 747 challenges, the Commission upheld 451 of the RTB findings (60%) with no change in the fine, upheld 126 of the RTB findings (16%) with fines changed, and waived 164 fines (21%). As of October 31, the Commission had not yet made a final determination in the 5 remaining cases.

**(b) (7)(E)**

(b) (7)(E)

Additionally, the Office of Administrative Review (OAR) forwarded 80% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).













# Office of Administrative Review

## **FY 2017 – 4<sup>th</sup> Quarter Highlights**

- **Processed 5 Reviewing Officer Recommendations in an average of 58.6 days**
- **Commission closed 8 OAR Final Determination Recommendations**
- **\$131,629 in fine payments collected**
- **Transferred 3 cases to Treasury for debt collection**
- **Continued working with OCIO to modify AF financial reports to accommodate OCFO process changes and increase efficiency. The new reports will be implemented in FY18.**
- **Designed new Status of Payments Report to be added to publicly released case files. This report will be implemented in FY18.**

# Office of Administrative Review

## Strategic Plan Performance Measurement: Process 75% of Reviewing Officer Recommendations circulated within 60 days of Challenge Filed Date

FY	2009	2010	2011	2012	2013	2014	2015	2016	2017 (10/1/16 – 9/30/17)
Challenges Received	67	11	60	11	26	6	35	12	<b>29</b>
Challenges Closed (FD)	67	9	60	10	31	5	32	11	<b>32</b>
Total Processing Days (avg.)	70	38.77	53.15	46.89	29.86	32.5	48.56	58	<b>50.03</b>
Percentage to Goal	60%	100%	100%	100%	93%	100%	97%	81.8%	<b>96.67%</b>
Fines Assessed (Inclusive of RAD)	\$463,232	\$57,237	\$428,434	\$142,960	\$627,40*	\$139,223	\$290,173	\$133,758	<b>\$446,718</b>
Fines Paid (Inclusive of RAD)	\$388,397	\$90,646	\$344,017	\$101,636	\$540,27*	\$94,171	\$199,948	\$123,838	<b>\$246,247</b>

\*Note: Includes \$191,135 civil money penalty for AF# 2512 (Obama for America) as included in Conciliation Agreement for MURs 6078, 6090, 6108, 6139, 6142 and 6214, and AF# 2512. Includes \$20,000 civil money penalty for AF# 2638 (McCain-Palin Compliance Fund Inc.) as included in Conciliation Agreement for MUR 6112.



# OAR Challenge Queue

(Confidential and Sensitive)

AF #	ID	Committee Name	Report		Reason To Believe		Challenge		Reviewed By Date	ROR Circ Date	Days to Review
			Year	Type	Date	Fine	Rcpt Date	Basis			
3298	C00610808	FRIENDS OF PAM TUCKER	2016	YE	04/03/2017	\$3,751	05/15/2017	LOA	07/14/2017	05/31/2017	16
3319	C00608737	COMMITTEE TO ELECT MARK A. HUNT FOR CONGRESS 2016	2016	48H	04/20/2017	\$7,048	05/31/2017	LOA/Not Required to File	07/30/2017	07/28/2017	58
3333	C00550871	ZINKE FOR CONGRESS	2016	48H	07/26/2017	\$3,929	09/01/2017	Committee computer/software/internet issues	10/31/2017	09/20/2017	19
3328	C00476457	CRANE FOR CONGRESS INC	2017	Q1	06/14/2017	\$9,030	09/05/2017	ET	11/04/2017	10/25/2017	50
3343	C00630012	IT STARTS TODAY	2017	MY	09/20/2017	\$11,114	10/25/2017	Committee computer/software/internet issues	12/24/2017		

5 Total Cases to Be Reviewed Average Review TAT 36

























































## AF Performance Goals

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Print Date: October 31, 2017

Selected Parameters:

Office: Both  
Start Date: 10/01/2016  
End Date: 09/30/2017  
\*Exception: YES



# AF Performance Goals

(Confidential and Sensitive)

## RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
<b>Processed</b>						
2016	YE	H_S_P_UNAUTH	N	01/31/2017	03/30/2017	
2016	30G	UNAUTH	N	12/08/2016	03/28/2017	
2016	30G	AUTH	N	12/08/2016	01/23/2017	
2016	12G	UNAUTH_Q	Y	10/27/2016	03/20/2017	
2016	12G	AUTH	Y	10/27/2016	12/12/2016	
2016	12G	UNAUTH_M	Y	10/27/2016	12/12/2016	
2016	Q3	H_S_P_UNAUTH	N	10/15/2016	12/06/2016	
2016	Q3	H_S_P_UNAUTH	Y	10/15/2016	12/06/2016	
2016	M9	P_UNAUTH	N	09/20/2016	11/15/2016	
2016	M8	P_UNAUTH	N	08/20/2016	10/17/2016	
2017	MY	UNAUTH	N	07/31/2017	09/18/2017	
2017	Q2	H_S_P	N	07/15/2017	09/07/2017	
2017	M6	P_UNAUTH	N	06/20/2017	08/14/2017	
2017	M5	P_UNAUTH	N	05/20/2017	07/18/2017	
2017	M4	P_UNAUTH	N	04/20/2017	06/12/2017	
2017	Q1	H_S_P	N	04/15/2017	06/12/2017	
2017	M3	P_UNAUTH	N	03/20/2017	05/10/2017	
2017	M2	P_UNAUTH	N	02/20/2017	04/18/2017	

Total AF Reports Processed 18

Average Processing Days 61.33

(b) (7)(E)

Percentage to Goal 88.89%

### Processed - No committees

Year	Type	Description	Election Sensitive	Due Date	Action Date	(b) (7)(E)
2016	30GR	AUTH	N	01/09/2017	03/09/2017	
2016	30GR	AUTH	N	12/22/2016	01/24/2017	
2016	M12	P_UNAUTH	N	12/20/2016	01/24/2017	
2016	30SG	AUTH	N	12/08/2016	01/17/2017	
2016	12GR	AUTH	Y	11/28/2016	01/17/2017	



# AF Performance Goals

(Confidential and Sensitive)

## Processed - No committees

					Action Date
2016	M11	P_UNAUTH	N	11/20/2016	01/17/2017
2016	12GR	AUTH	Y	11/10/2016	12/12/2016
2016	12SG	AUTH	Y	10/27/2016	12/07/2016
2016	M10	P_UNAUTH	N	10/20/2016	12/07/2016
2016	M10	P_UNAUTH	Y	10/20/2016	12/07/2016
2016	12P	AUTH	Y	09/01/2016	10/27/2016
2016	12SP	AUTH	Y	09/01/2016	10/27/2016
2016	12P	AUTH	Y	08/27/2016	10/20/2016
2016	12P	AUTH	Y	08/18/2016	10/17/2016
2016	12P	AUTH	Y	08/15/2016	10/03/2016
2016	12PR	AUTH	Y	08/15/2016	10/03/2016
2017	12SP	AUTH	Y	08/03/2017	09/29/2017
2017	30SG	AUTH	N	07/20/2017	09/18/2017
2017	30SGR	AUTH	N	07/20/2017	09/18/2017
2017	M7	P_UNAUTH	N	07/20/2017	09/18/2017
2017	30SGR	AUTH	N	07/06/2017	08/17/2017
2017	30SG	AUTH	N	06/24/2017	08/17/2017
2017	12SG	AUTH	Y	06/08/2017	07/24/2017
2017	12SGR	AUTH	Y	06/08/2017	07/24/2017
2017	12SGR	AUTH	Y	05/25/2017	07/22/2017
2017	30SG	AUTH	N	05/18/2017	07/10/2017
2017	12SG	AUTH	Y	05/13/2017	07/10/2017
2017	30SG	AUTH	N	05/11/2017	07/10/2017
2017	12SPR	AUTH	Y	05/04/2017	06/29/2017
2017	30SG	AUTH	N	05/04/2017	06/29/2017
2017	12SP	AUTH	Y	04/20/2017	06/12/2017
2017	12SG	AUTH	Y	04/06/2017	06/01/2017
2017	12SG	AUTH	Y	03/30/2017	05/18/2017
2017	12SG	AUTH	Y	03/23/2017	05/18/2017

(b) (7)(E)

Total AF Reports Processed-No Committees	34
Average Processing Days	51.41
(b) (7)(E)	
Percentage to Goal	100.00%





# AF Performance Goals

(Confidential and Sensitive)

Total AF Reports	52
Average Processing Days	54.85

(b) (7)(E)

Percentage to Goal	96.15%
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RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters  
RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters  
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H  
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



# AF Performance Goals

(Confidential and Sensitive)

## OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2016	Q1	3067	C00432096	09/06/2016	11/02/2016	57	Y
2016	12P	3086	C00559492	09/08/2016	11/03/2016	56	Y
2016	48H	3089	C00592659	10/04/2016	11/16/2016	43	Y
2016	Q2	3118	C00588756	10/24/2016	11/16/2016	23	Y
2016	Q2	3124	C00612929	10/25/2016	12/13/2016	49	Y
2016	Q2	3125	C00607564	10/24/2016	12/15/2016	52	Y
2016	Q2	3128	C00586578	10/25/2016	12/15/2016	51	Y
2016	Q2	3130	C00606897	10/25/2016	12/15/2016	51	Y
2016	Q2	3131	C00565598	10/25/2016	12/20/2016	56	Y
2016	Q2	3138	C00520064	10/31/2016	12/28/2016	58	Y
2016	M7	3140	C00438291	10/31/2016	12/28/2016	58	Y
2016	M8	3144	C00496505	11/17/2016	01/12/2017	56	Y
2016	M8	3146	C00544767	11/17/2016	01/12/2017	56	Y
2016	48H	3148	C00266940	11/16/2016	01/11/2017	56	Y
2016	M9	3149	C00496505	11/23/2016	01/12/2017	50	Y
2016	M9	3151	C00544767	11/23/2016	01/12/2017	50	Y
2016	Q3	3163	C00610113	12/27/2016	02/23/2017	58	Y
2016	Q3	3169	C00593103	01/23/2017	03/23/2017	59	Y
2016	Q3	3171	C00581926	02/13/2017	04/13/2017	59	Y
2016	48H	3234	C00484683	03/27/2017	07/06/2017	101	N
2016	12G	3249	C00558452	05/04/2017	06/29/2017	56	Y
2016	30G	3269	C00603563	04/12/2017	06/09/2017	58	Y
2016	YE	3298	C00610808	05/15/2017	05/31/2017	16	Y
2016	YE	3302	C00622555	05/08/2017	05/26/2017	18	Y



# AF Performance Goals

(Confidential and Sensitive)

2016	YE	3304	C00603563	05/01/2017	06/09/2017	39	Y
2016	YE	3312	C00607762	05/08/2017	05/31/2017	23	Y
2016	48H	3319	C00608737	05/31/2017	07/28/2017	58	Y
2016	48H	3324	C00578344	06/05/2017	08/04/2017	60	Y
2016	48H	3325	C00459255	07/07/2017	08/31/2017	55	Y
2016	48H	3333	C00550871	09/01/2017	09/20/2017	19	Y

Total Challenges Processed 30

Average Processing Days 50.03

Total Reports Processed within 60 Days 29

Percentage to Goal 96.67%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

AGENDA DOCUMENT NO. X18-04



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
2018 JAN 31 PM 1:50

January 31, 2018

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer *AWP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista Roche *KR*  
Acting Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Thomas Hintermister *TH*  
Assistant Staff Director  
Audit Division

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2018 – 1st Quarter Highlights (10/1/17 – 12/31/17) & FY Statistical Overview

**SENSITIVE**

**AGENDA ITEM**

For Meeting of 2-6-18

**SUBMITTED LATE**

### **Administrative Fine Program (Office of Administrative Review)**

During the first quarter of FY 2018, the Commission processed 6 Reason to Believe (RTB) findings. OAR received 4 challenges and processed 4 Reviewing Officer Recommendations (RORs). The Commission reviewed final determination recommendations in 12 cases, and made a final determination that the respondents in these cases violated 2 U.S.C. § 30104(a) and assessed penalties totaling \$53,484. The Commission also collected \$77,002 in fine payments and prepared 10 cases for public release.

As of January 31, 2018 the Commission has approved a total of 3,144 RTB findings and 3,078 final determination recommendations. The AFP has collected \$4.74 million, received 751 challenges, and publicly released 3,061 cases. Of the 751 challenges, the Commission upheld 452 of the RTB findings (60%) with no change in the fine, upheld 128 of the RTB findings (17%) with fines changed, and waived 165 fines (22%). As of January 31, the Commission had not yet made a final determination in the 5 remaining cases.

**(b) (7)(E)**

(b) (7)(E)

Additionally, the Office of

Administrative Review (OAR) forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

During the first quarter, the Reviewing Officer worked with OCIO and OCFO to implement new financial reports to accommodate OCFO reporting requirements and increase efficiency in reconciliation. The Reviewing Officer also worked with OCIO, OGC, and Public Records to implement a Status of Payments Report for publicly released case files. The report contains a snapshot of all payments received and the outstanding balance of a given AF case. The new report has significantly streamlined the process of adding payment documentation to existing case files.













# Office of Administrative Review

## **FY 2018 – 1st Quarter Highlights**

- **Processed 4 Reviewing Officer Recommendations in an average of 52.5 days**
- **Commission closed 3 OAR Final Determination Recommendations**
- **\$77,002 in fine payments collected**
- **Transferred 15 cases to Treasury for debt collection**
- **Implemented new AF financial reports to accommodate OCFO process/reporting changes and increase efficiency.**
- **Implemented new Status of Payments Report for publicly released case files. The report details all payments received and outstanding balance of the AF case.**

# Office of Administrative Review

## Strategic Plan Performance Measurement: Process 75% of Reviewing Officer Recommendations circulated within 60 days of Challenge Filed Date

FY	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018 (10/1/17 – 12/31/17)
Challenges Received	67	11	60	11	26	6	35	12	29	4
Challenges Closed (FD)	67	9	60	10	31	5	32	11	32	3
Total Processing Days (avg.)	70	38.77	53.15	46.89	29.86	32.5	48.56	58	50.03	52.5
Percentage to Goal	60%	100%	100%	100%	93%	100%	97%	81.8%	96.67%	100%
Fines Assessed (Inclusive of RAD)	\$463,232	\$57,237	\$428,434	\$142,960	\$627,408*	\$139,223	\$290,173	\$133,758	\$446,718	\$53,484
Fines Paid (Inclusive of RAD)	\$388,397	\$90,646	\$344,017	\$101,636	\$540,273*	\$94,171	\$199,948	\$123,838	\$246,247	\$77,002

\*Note: Includes \$191,135 civil money penalty for AF# 2512 (Obama for America) as included in Conciliation Agreement for MURs 6078, 6090, 6108, 6139, 6142 and 6214, and AF# 2512. Includes \$20,000 civil money penalty for AF# 2638 (McCain-Palin Compliance Fund Inc.) as included in Conciliation Agreement for MUR 6112.



# OAR Challenge Queue

(Confidential and Sensitive)

AF #	ID	Committee Name	Report		Reason To Believe		Challenge		Reviewed By Date	ROR Circ Date	Days to Review
			Year	Type	Date	Fine	Rcpt Date	Basis			
3319	C00608737	COMMITTEE TO ELECT MARK A. HUNT FOR CONGRESS 2016	2016	48H	04/20/2017	\$7,048	05/31/2017	LOA/Not Required to File	07/30/2017	07/28/2017	58
3343	C00630012	IT STARTS TODAY	2017	MY	09/20/2017	\$11,114	10/24/2017	Contractor/Vender Error	12/23/2017	12/20/2017	57
3336	C00607762	SOULES FOR US CONGRESS	2016	48H	08/31/2017	\$11,845	10/31/2017	CE	12/30/2017	12/28/2017	58
3351	C00640219	PAULA SWEARENGIN 2018	2017	Q3	11/30/2017	\$2,919	12/28/2017	First Time Candidate/New Committee /Voluntary Senate E-Filing	02/26/2018		
3350	C00440909	BYRNE FOR CONGRESS	2017	Q3	11/30/2017	\$4,862	01/09/2018	Not Required to File	03/10/2018		

5 Total Cases to Be Reviewed

Average Review TAT 58

































































## AF Performance Goals

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Print Date: January 31, 2018

Selected Parameters:

Office: Both

Start Date: 10/01/2017

End Date: 12/31/2017

\*Exception: YES



# AF Performance Goals

(Confidential and Sensitive)

## RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
<b>Processed</b>						
2017	M10	P_UNAUTH	N	10/20/2017	11/27/2017	
2017	Q3	H_S_P	N	10/15/2017	11/27/2017	
2017	M9	P_UNAUTH	N	09/20/2017	11/06/2017	
2017	M8	P_UNAUTH	N	08/20/2017	10/02/2017	

Total AF Reports Processed 4  
 Average Processing Days 42.75  
 Percentage to Goal 100.00%

(b) (7)(E)

### Processed - No committees

Year	Type	Description	Election Sensitive	Due Date	Action Date	(b) (7)(E)
2017	12SG	AUTH	Y	10/26/2017	12/14/2017	
2017	M10	P_UNAUTH	Y	10/20/2017	11/20/2017	
2017	Q3	H_S_P	Y	10/15/2017	12/05/2017	
2017	12SPR	AUTH	Y	09/14/2017	11/06/2017	

Total AF Reports Processed-No Committees 4  
 Average Processing Days 46.00  
 Percentage to Goal 100.00%

(b) (7)(E)



# AF Performance Goals

(Confidential and Sensitive)

Total AF Reports	8
Average Processing Days	44.38

(b) (7)(E)

Percentage to Goal	100.00%
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RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters  
RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters  
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H  
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



# AF Performance Goals

(Confidential and Sensitive)

## OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2017	Q1	3328	C00476457	09/05/2017	10/25/2017	50	Y
2016	48H	3336	C00607762	10/31/2017	12/28/2017	58	Y
2017	MY	3343	C00630012	10/24/2017	12/20/2017	57	Y
2017	MY	3344	C00623355	10/30/2017	12/14/2017	45	Y

Total Challenges Processed 4

Average Processing Days 52.50

Total Reports Processed within 60 Days 4

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

FEDERAL ELECTION COMMISSION  
SECRETARIAT

2018 APR 30 AM 10: 52

**SENSITIVE**

April 30, 2018

**MEMORANDUM**

AGENDA DOCUMENT NO. X18-21  
AGENDA ITEM  
For the meeting of May 8, 2018

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista Roche *KJR*  
Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Thomas Hintermister *TH*  
Assistant Staff Director  
Audit Division

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2018 – 2<sup>nd</sup> Quarter Highlights (1/1/18 – 3/31/18) & FY Statistical Overview

---

### **Administrative Fine Program (Office of Administrative Review)**

During the second quarter of FY 2018, the Commission processed 2 Reason to Believe (RTB) findings. OAR received 1 challenge and processed 1 Reviewing Officer Recommendations (RORs). The Commission reviewed final determination recommendations in 9 cases, and made a final determination that the respondents in these cases violated 52 U.S.C. § 30104(a) and assessed penalties totaling \$57,319. The Commission also collected \$44,937.23 in fine payments and prepared 21 cases for public release.

**(b) (7)(E)**

(b) (7)(E)

Additionally, the Office of Administrative Review (OAR) forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

During the second quarter, the Reviewing Officer began working with Pay.gov and OGC to expand the electronic payment option to those respondents involved in OGC enforcement matters. Consistent with what is already available to respondents in AF and ADR matters, the new OGC Electronic Payment System will give respondents the option to pay a civil money penalty by debit or credit card, or automated clearing house (ACH) withdrawal on Pay.gov. The new service is currently in the testing phase and is scheduled to deploy in the third quarter.







# Status of Compliance

FY 2018  
(10/1/2017 - 3/31/2018)

## Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 15	FY 16	FY 17	FY 18 (3/31/18)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	<b>99.9%</b>
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	<b>98.9%</b>
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	<b>100%</b>

## Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

## Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2018 Performance Goals	Status as of 3/31/18
RAD staff collaborated with OCIO on the creation of reporting examples for the FEC website	Candidate reporting examples posted – October 2017 First set of SSF and Nonconnected reporting examples posted – March 2018 Party reporting examples are being worked on now
RAD staff collaborated with Information Division to present workshops in FEC conferences and webinars	Candidate, PAC, Party & FECfile webinars – January 2018 FEC Scottsdale, AZ conference – February 2018
RAD staff proposed revisions to Standard 26 of the 2017-2018 RAD Review & Referral Procedures to address dormant Title 52 authorized committees of former federal candidates and officeholders	The Commission approved the revisions with edits on 4/24/18. A Record Article was posted on the FEC website summarizing the new review and providing guidance on permissible uses of funds.

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

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

Performance Goals	FY 13	FY 14	FY 15	FY 16	FY 17	FY 18 (3/31/18)
RAD to review 75% of reports within 90 days of receipt	72.6%	85.4%	79.3%	92.9%	76.6%	<b>92%</b>
RAD to send 75% of RFAs within 40 days of report review	72%	84%	92%	92%	88%	<b>90%</b>
(b) (7)(E)	91.1%	96.8%	93.5%	100%	96.2%	<b>100%</b>
(b) (7)(E)	38%	93%	43%	56%	25%	<b>0%</b>
OAR to circulate 60% of Reviewing Officer Recommendations within 60 days	93%	100%	97%	81.8%	96.67%	<b>100%</b>
(b) (7)(E)	100%	95%	100%	100%	100%	<b>88%</b>

## Strategic Objective 4: Foster a Culture of High Performance

## Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 13	FY 14	FY 15	FY 16	FY 17	FY 18 (3/31/18)
RAD	Documents/ Transactions Coded	N/A	N/A	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	<b>3,802/ 15,743,768</b>
	Documents/Pages Processed in Paper Automation System	N/A	N/A	N/A	N/A	8,139/ 684,747	<b>3,664/ 348,826</b>
	Documents/Pages Reviewed	87,190/ 10,490,683	68,282/ 9,211,502	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	<b>31,613/ 23,883,200</b>
	Letters sent	15,543	10,220	13,433	13,253	14,796	<b>5,090</b>
	Telephone calls handled	14,254	10,673	11,822	12,362	11,634	<b>5,784</b>
	Referrals	88	59	91	43	95	<b>29</b>
	AF Cases RTB/FD	194/184	70/55	191/159	83/33	163/168	<b>8/18</b>
Audit	<b>(b) (7)(E)</b>						
ADRO							
OAR	Cases Received	26	6	35	12	29	<b>5</b>
	Cases Closed (FD)	31	5	32	11	32	<b>7</b>































## AF Performance Goals

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Print Date: April 30, 2018

Selected Parameters:

Office: Both

Start Date: 10/01/2017

End Date: 03/31/2018

\*Exception: YES



# AF Performance Goals

(Confidential and Sensitive)

## RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
<b>Processed</b>						
2017	YE	H_S_P_UNAUTH	N	01/31/2018	03/26/2018	
2017	M12	P_UNAUTH	N	12/20/2017	02/12/2018	
2017	M11	P_UNAUTH	N	11/20/2017	01/08/2018	
2017	M10	P_UNAUTH	N	10/20/2017	11/27/2017	
2017	Q3	H_S_P	N	10/15/2017	11/27/2017	
2017	M9	P_UNAUTH	N	09/20/2017	11/06/2017	
2017	M8	P_UNAUTH	N	08/20/2017	10/02/2017	

Total AF Reports Processed 7

Average Processing Days 46.86

(b) (7)(E)

Percentage to Goal 100.00%

### Processed - No committees

Year	Type	Description	Election Sensitive	Due Date	Action Date	(b) (7)(E)
2017	30SG	AUTH	N	01/11/2018	03/07/2018	
2017	30SG	AUTH	N	12/07/2017	01/29/2018	
2017	12SG	AUTH	Y	11/30/2017	01/08/2018	
2017	12SG	AUTH	Y	10/26/2017	12/14/2017	
2017	M10	P_UNAUTH	Y	10/20/2017	11/20/2017	
2017	Q3	H_S_P	Y	10/15/2017	12/05/2017	
2017	12SPR	AUTH	Y	09/14/2017	11/06/2017	

Total AF Reports Processed-No Committees 7

Average Processing Days 47.29

(b) (7)(E)

Percentage to Goal 100.00%



# AF Performance Goals

(Confidential and Sensitive)

Total AF Reports 14

Average Processing Days 47.07

(b) (7)(E)

Percentage to Goal 100.00%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters  
RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters  
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H  
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



# AF Performance Goals

(Confidential and Sensitive)

## OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2017	Q1	3328	C00476457	09/05/2017	10/25/2017	50	Y
2016	48H	3336	C00607762	10/31/2017	12/28/2017	58	Y
2017	MY	3343	C00630012	10/24/2017	12/20/2017	57	Y
2017	MY	3344	C00623355	10/30/2017	12/14/2017	45	Y
2017	Q3	3350	C00440909	01/09/2018	03/07/2018	57	Y
2017	Q3	3351	C00640219	12/28/2017	02/21/2018	55	Y

Total Challenges Processed 6

Average Processing Days 53.67

Total Reports Processed within 60 Days 6

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters



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2018 JUL 31 PM 3:35

**SENSITIVE**

July 31, 2018

**MEMORANDUM**

AGENDA DOCUMENT NO. **X18-40**

AGENDA ITEM

For meeting of **8-7-18**

TO: The Commission

THROUGH: Alec Palmer *swp/for*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista Roche *KJR*  
Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Thomas Hintermister *TH*  
Assistant Staff Director  
Audit Division

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2018 – 3<sup>rd</sup> Quarter Highlights (4/1/18 – 6/30/18) & FY Statistical Overview

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### **Administrative Fine Program (Office of Administrative Review)**

During the third quarter of FY 2018, the Commission processed 46 Reason to Believe (RTB) findings. OAR received 1 challenge and processed 1 Reviewing Officer Recommendations (RORs). The Commission reviewed final determination recommendations in 2 cases, made a final determination that the respondents in 1 case violated 52 U.S.C. § 30104(a) and assessed no penalties. The Commission also collected \$2,420 in fine payments and prepared 1 case for public release.

# (b) (7)(E)


(b) (7)(E)

Additionally, the Office of Administrative Review (OAR) forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

During the third quarter, the Reviewing Officer worked with Pay.gov to successfully deploy the OGC Electronic Payment System and also provided assistance to ADRO to handle an increased caseload.








# Status of Compliance

FY 2018  
(10/1/2017 – 6/30/2018)



Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 15	FY 16	FY 17	FY 18 (6/30/18)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	99.1%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%

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

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

FY 2018 Performance Goals	Status 6/30/18
RAD staff collaborated with OGC and other agency offices on a scam PAC recommendation memo to the Commission	Memorandum proposing Commission actions to address "scam PACs" emailed to the Commission on May 22, 2018
RAD staff collaborated with Information Division to present workshops in FEC conferences and webinars	Reporting & FECfile webinars – April, May & June 2018
RAD staff met with OGC to provide input for revisions to the EPS rating process	Enforcement Priority System Rating Sheet is on the July 31, 2018 Executive Session Agenda for discussion.

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

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

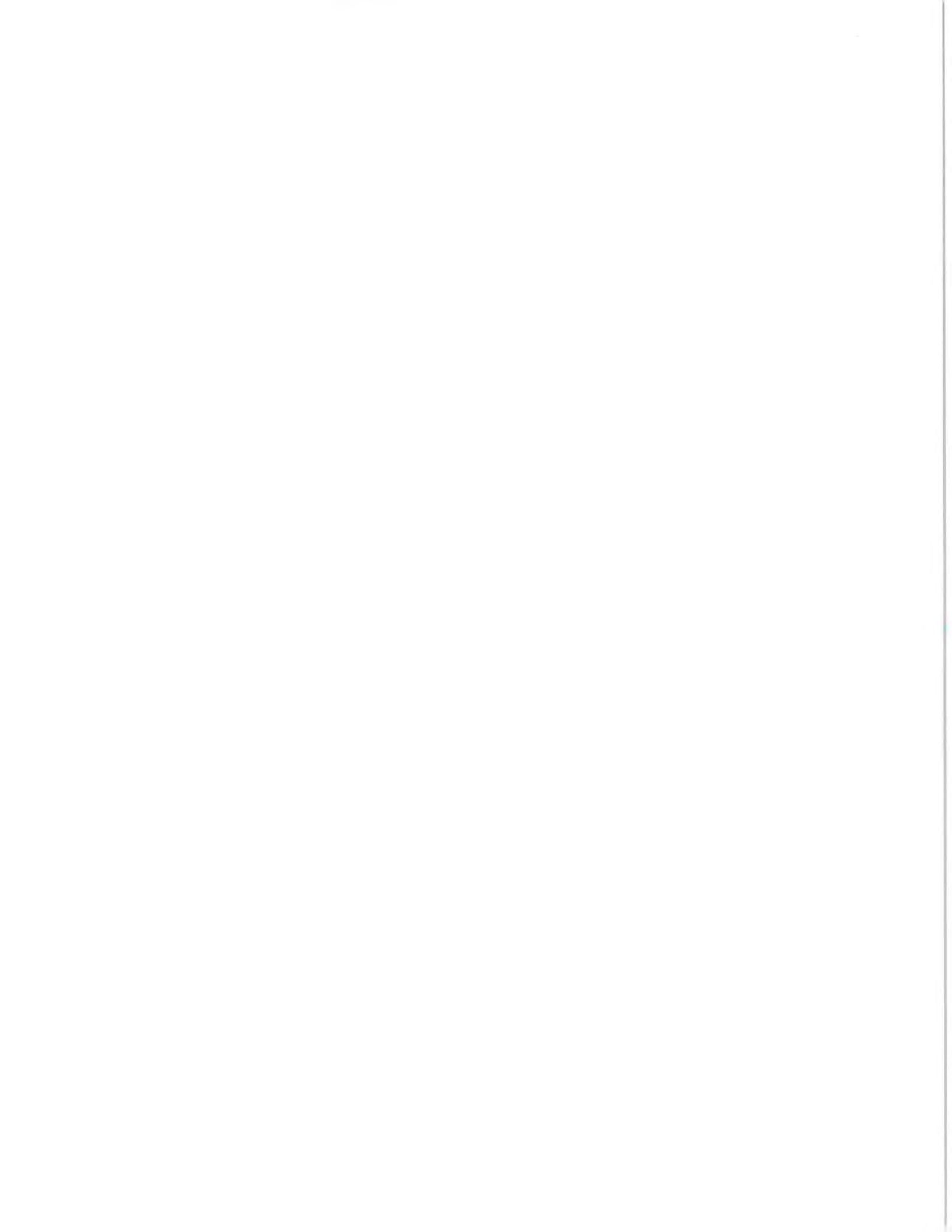
Performance Goals	FY 13	FY 14	FY 15	FY 16	FY 17	FY 18 (2022)
RAD to review 75% of reports within 90 days of receipt	72.6%	85.4%	79.3%	92.9%	76.6%	93.3%
RAD to send 75% of RFIs within 40 days of report review	72%	84%	92%	92%	88%	86%
(b) (7)(E)	91.1%	96.8%	93.5%	100%	96.2%	95.4%
(b) (7)(E)	38%	93%	43%	56%	25%	33%
DAR to circulate 60% of Reviewing Officer Recommendations within 60 days	93%	100%	97%	81.8%	96.67%	100%
(b) (7)(E)	100%	95%	100%	100%	100%	78%

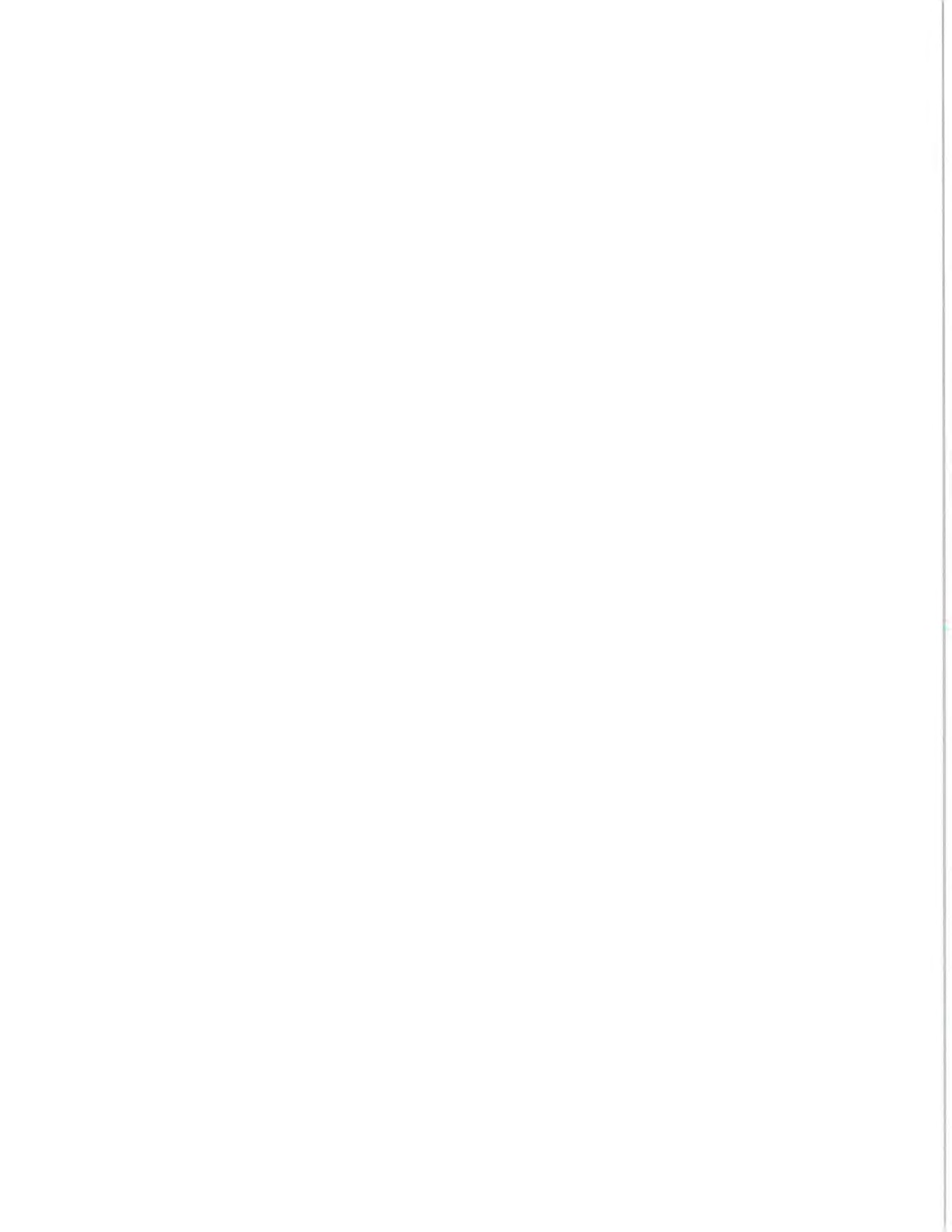


## Strategic Objective 4: Foster a Culture of High Performance

## Performance Goal 1: Foster a workplace that delivers results

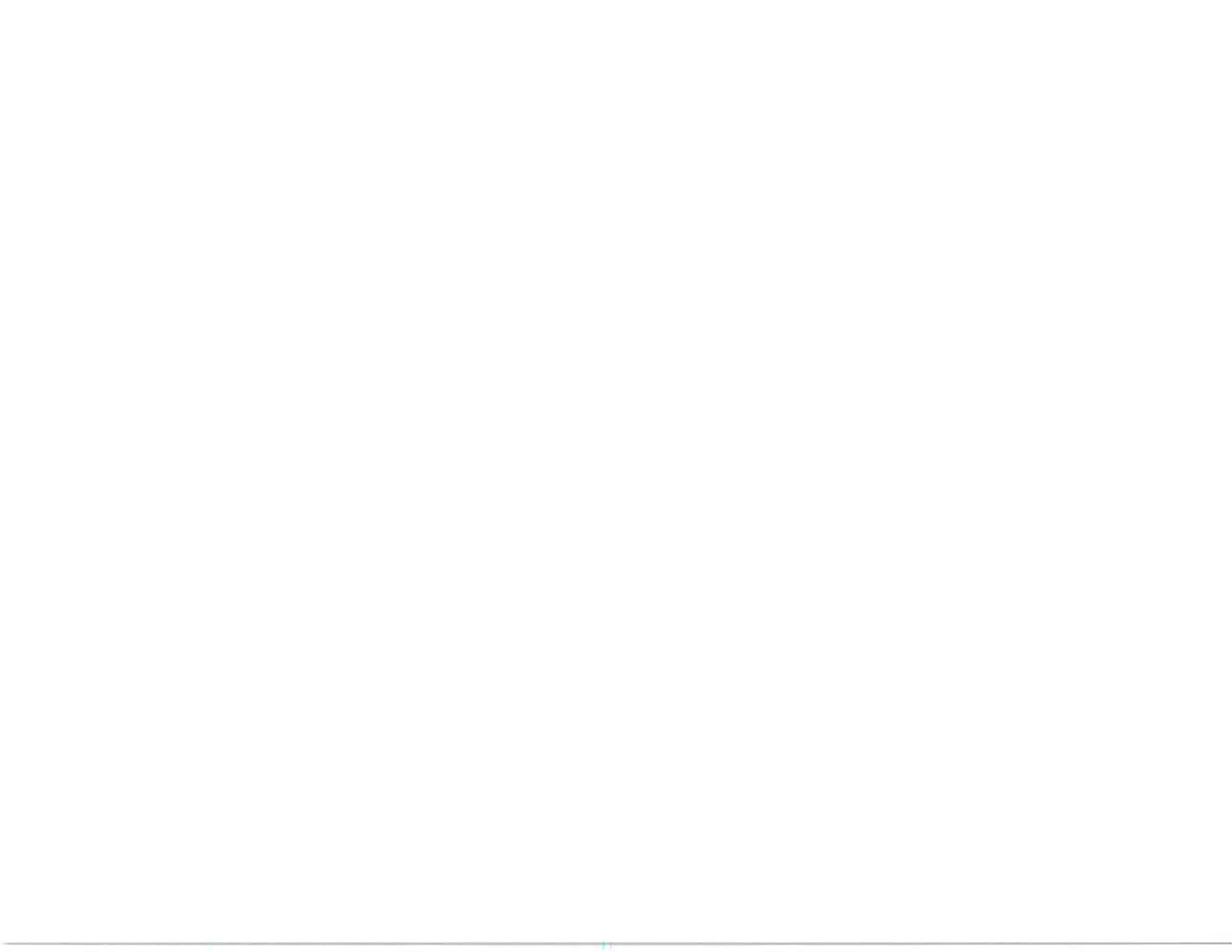
Office	Deliverable	FY 13	FY 14	FY 15	FY 16	FY 17	FY 18 (6/30/18)
RAD	Documents/ Transactions Coded	N/A	N/A	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	6,628/ 23,621,643
	Documents/Pages Processed in Paper Automation System	N/A	N/A	N/A	N/A	8,139/ 684,747	6,413/ 628,003
	Documents/Pages Reviewed	87,190/ 10,490,683	68,282/ 9,211,502	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	55,835/ 38,138,700
	Letters sent	15,543	10,220	13,433	13,253	14,796	10,387
	Telephone calls handled	14,254	10,673	11,822	12,362	11,634	9,598
	Referrals	88	59	91	43	95	39
	AF Cases RTB/FD	194/184	70/55	191/159	83/33	163/168	54/18
Audit	<b>(b) (7)(E)</b>						
ADRO							
OAR	Cases Received	26	6	35	12	29	6
	Cases Closed (FD) Appendix A	31	5	32	11	32	9









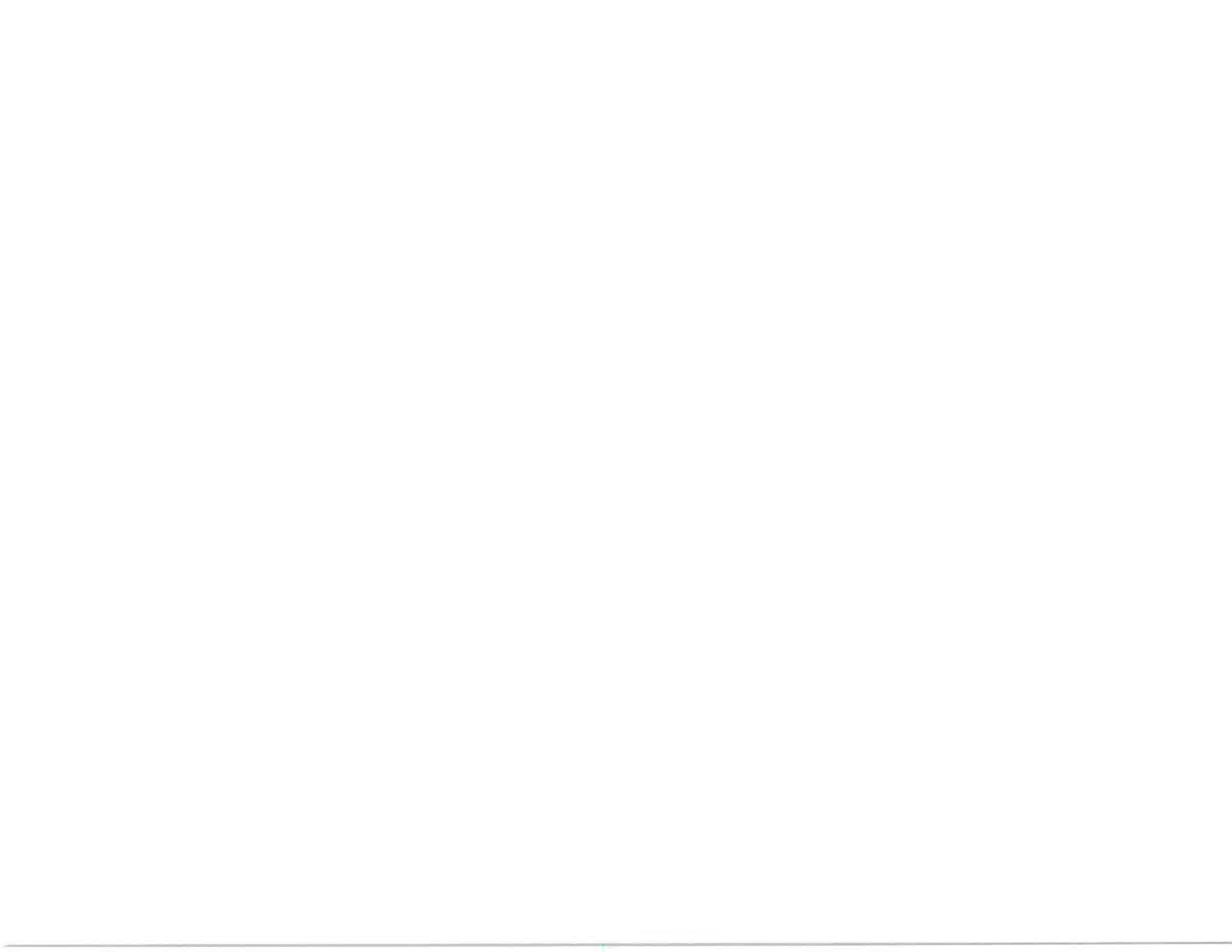


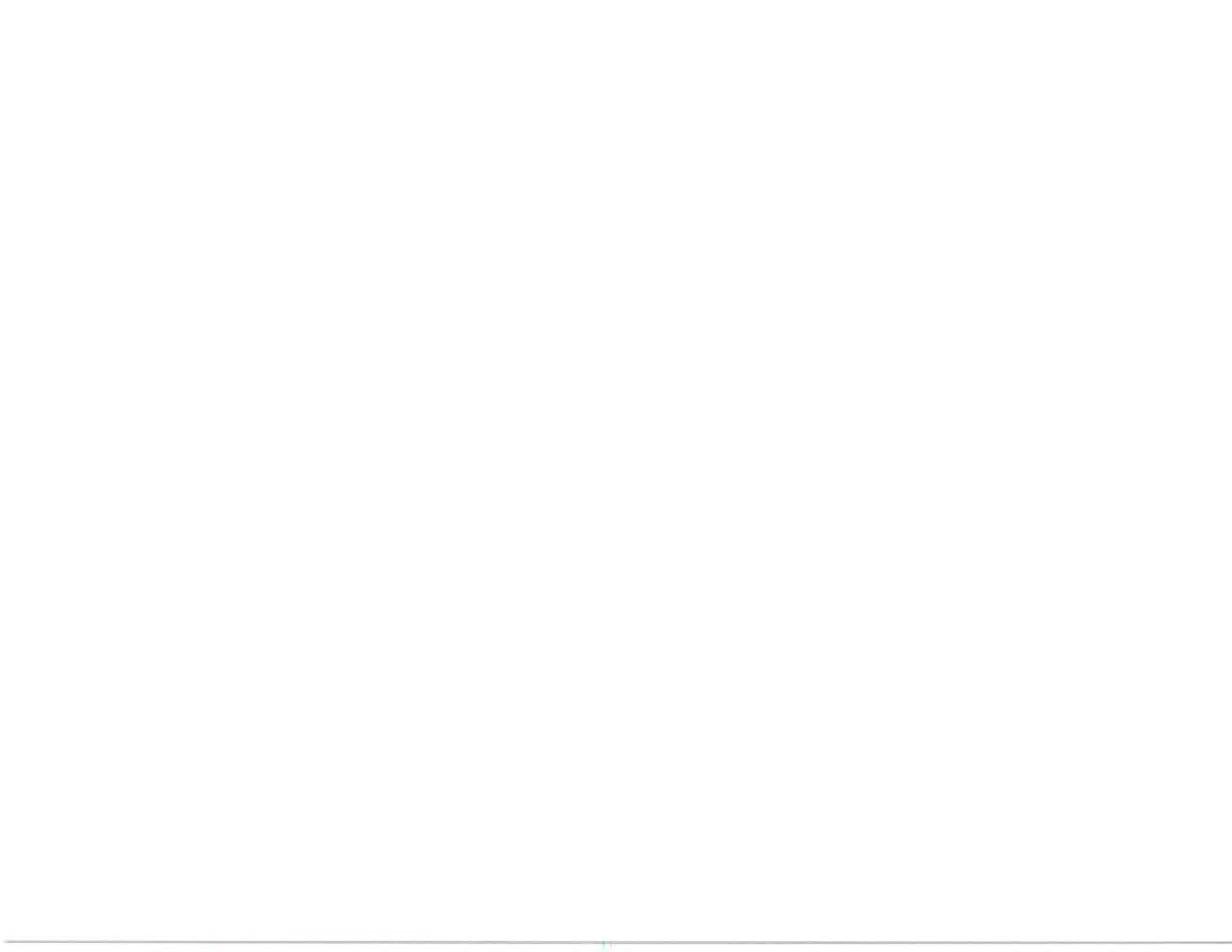








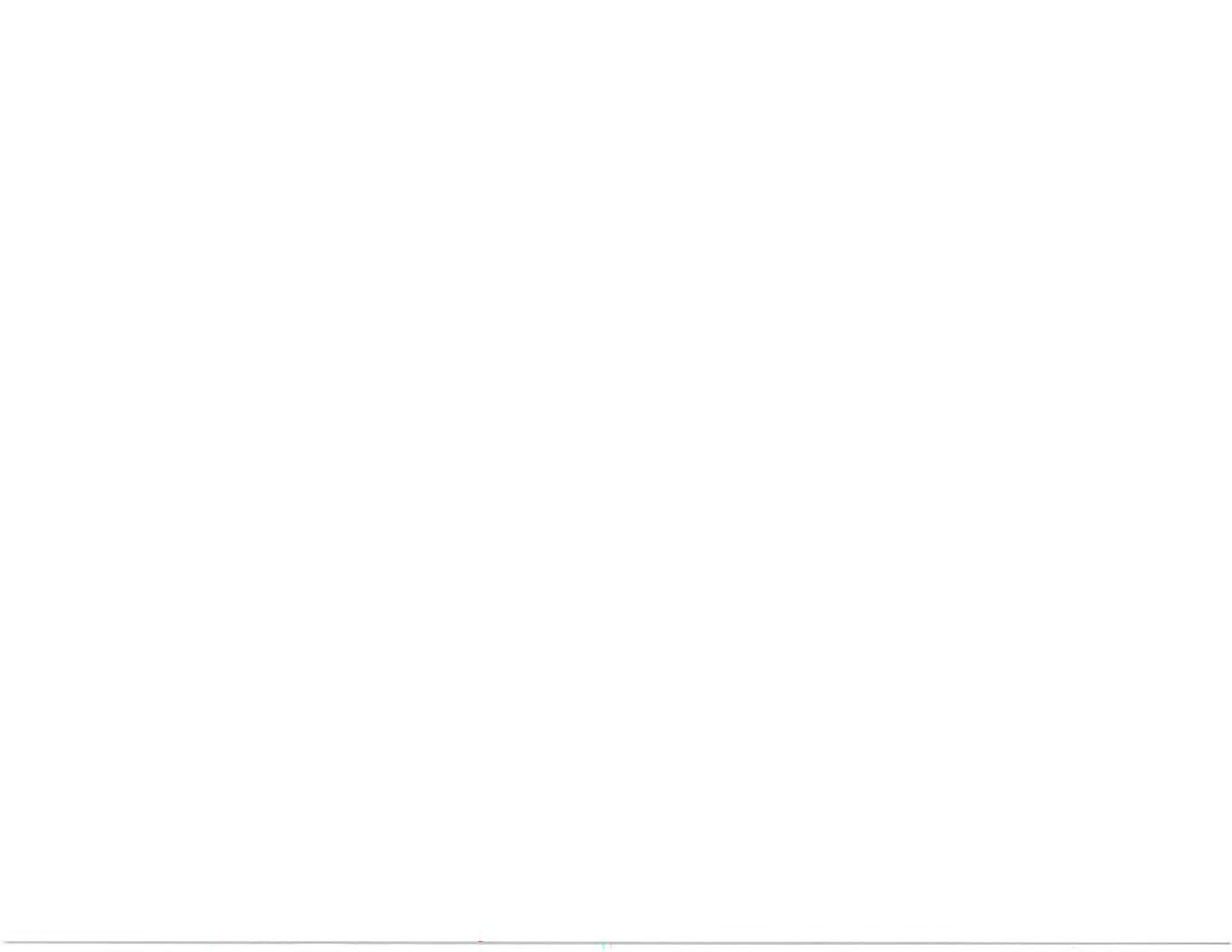












Agenda Document No. X18-59



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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FEDERAL ELECTION COMMISSION  
SECRETARIAT

2018 OCT 31 AM 11:57

**SENSITIVE**

**AGENDA ITEM**

October 31, 2018

***For Meeting of 11-8-18***

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer *AP* by *MAH*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista Roche *KJR*  
Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Thomas Hintermister *TH*  
Assistant Staff Director  
Audit Division

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2018 – 4<sup>th</sup> Quarter Highlights (7/1/18 – 9/30/18) & FY Statistical Overview

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### **Administrative Fine Program (Office of Administrative Review)**

During the fourth quarter of FY 2018, the Commission processed 41 Reason to Believe (RTB) findings. OAR received 2 challenges and processed 1 Reviewing Officer Recommendation (ROR). The Commission reviewed final determination recommendations in 6 cases, made a final determination that the respondents in 5 cases violated 52 U.S.C. § 30104(a) and assessed \$29,739

in civil penalties. The Commission also collected \$24,411 in fine payments, transferred 4 cases to the Department of the Treasury for debt collection, and prepared 6 cases for public release.


## (b) (7)(E)

(b) (7)(E) Additionally, OAR forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

During the fourth quarter, the Reviewing Officer worked with the Information Division and Pay.gov to successfully develop and deploy the FEC Training Electronic Payment System, participated on hiring panels, and also provided assistance to ADRO to handle an increased caseload.








# Status of Compliance

FY 2018  
(10/1/2017 - 9/30/2018)



**Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data**

**Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent**

Performance Goals	FY 15	FY 16	FY 17	FY 18 (9/30/18)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	<b>99.9%</b>
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	<b>99.0%</b>
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	<b>100%</b>

## Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

## Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2018 Performance Goals	Status 9/30/18
<p>RAD staff collaborated with OGC, OCIO, the Press Office, Congressional Affairs, and the Information Division on a plan and guidance for Senate filers upon enactment of law requiring them to file with the FEC.</p>	<p>Immediately after legislation was signed into law, guidance was placed on the FEC website and emailed to all Senate filers. It was also included in the FEC Digest and as a Tips for Treasurers.</p>
<p>RAD staff collaborated with ADRO, Audit, OGC and the Information Division on the Audit/ADRO Education Group for 2014 cycle audit referrals, as directed by the Commission.</p>	<p>Negotiated settlement agreements are in the process of being developed. Corrective action plans and training plans have been developed for all six committees.</p>
<p>RAD staff participated in the kick off meeting and subsequent status meetings for the Next Gen Efiling Project.</p>	<p>Phase 1 of development is underway. RAD staff provided user stories and participated in requirements gathering.</p>

**Strategic Objective 2: Promote Compliance with the FECA and Related Statutes**

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

Performance Goals	FY 13	FY 14	FY 15	FY 16	FY 17	FY 18 (9/30/18)
RAD to review 75% of reports within 90 days of receipt	72.6%	85.4%	79.3%	92.9%	76.6%	92.2%
RAD to send 75% of RFAs within 40 days of report review	72%	84%	92%	92%	88%	88%
(b) (7)(E)	91.1%	96.8%	93.5%	100%	96.2%	96.9%
(b) (7)(E)	38%	93%	43%	56%	25%	46%
OAR to circulate 60% of Reviewing Officer Recommendations within 60 days	93%	100%	97%	81.8%	96.67%	100%
(b) (7)(E)	100%	95%	100%	100%	100%	99%

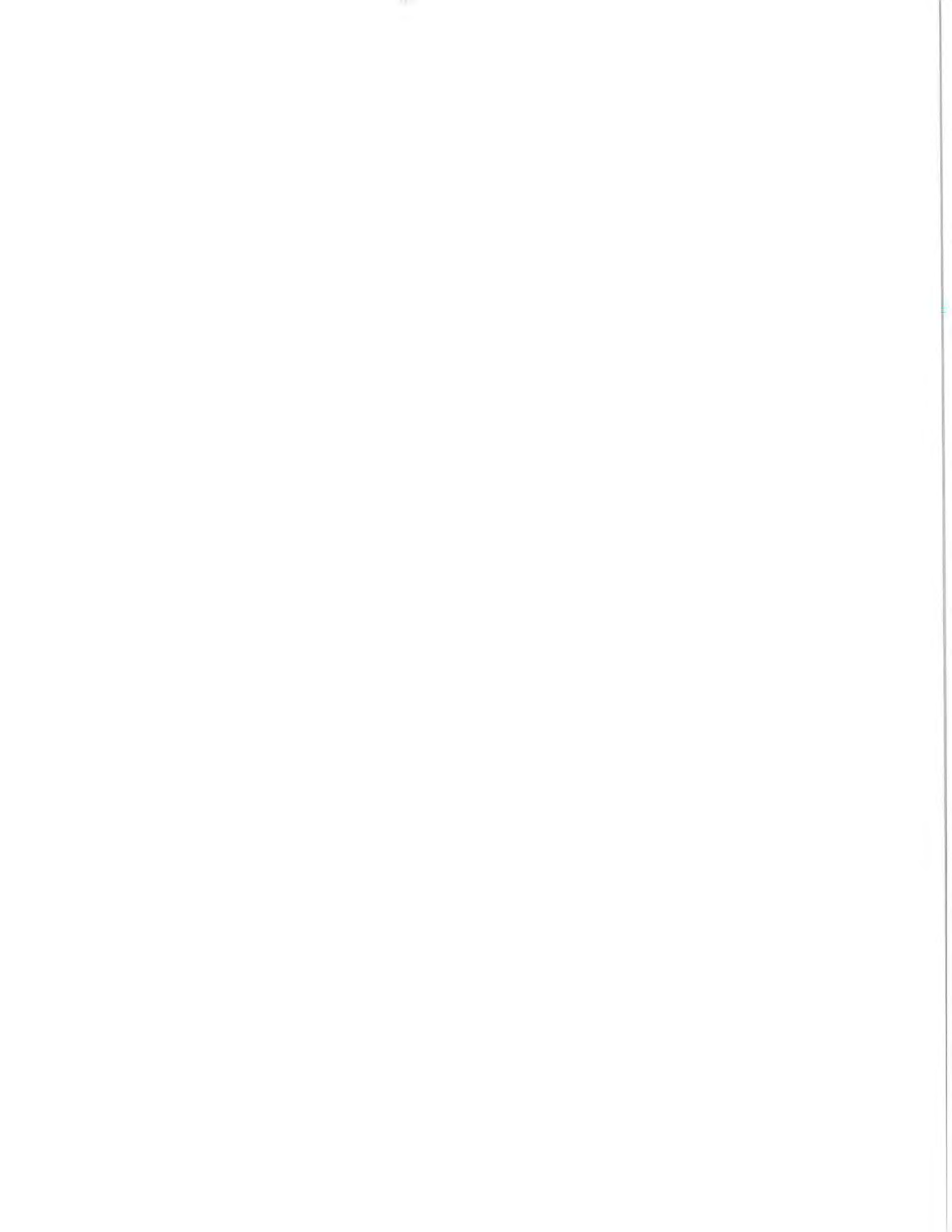


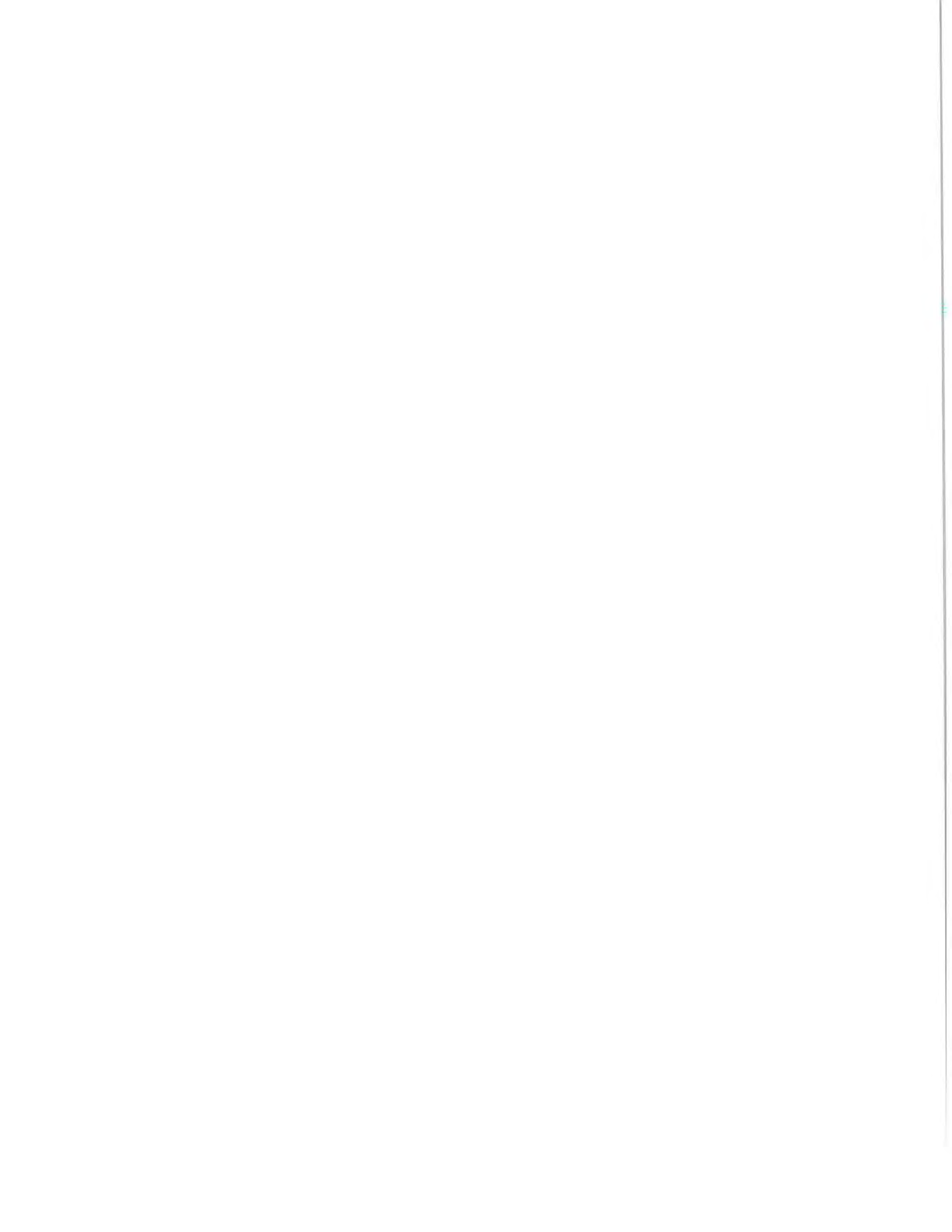
## Strategic Objective 4: Foster a Culture of High Performance

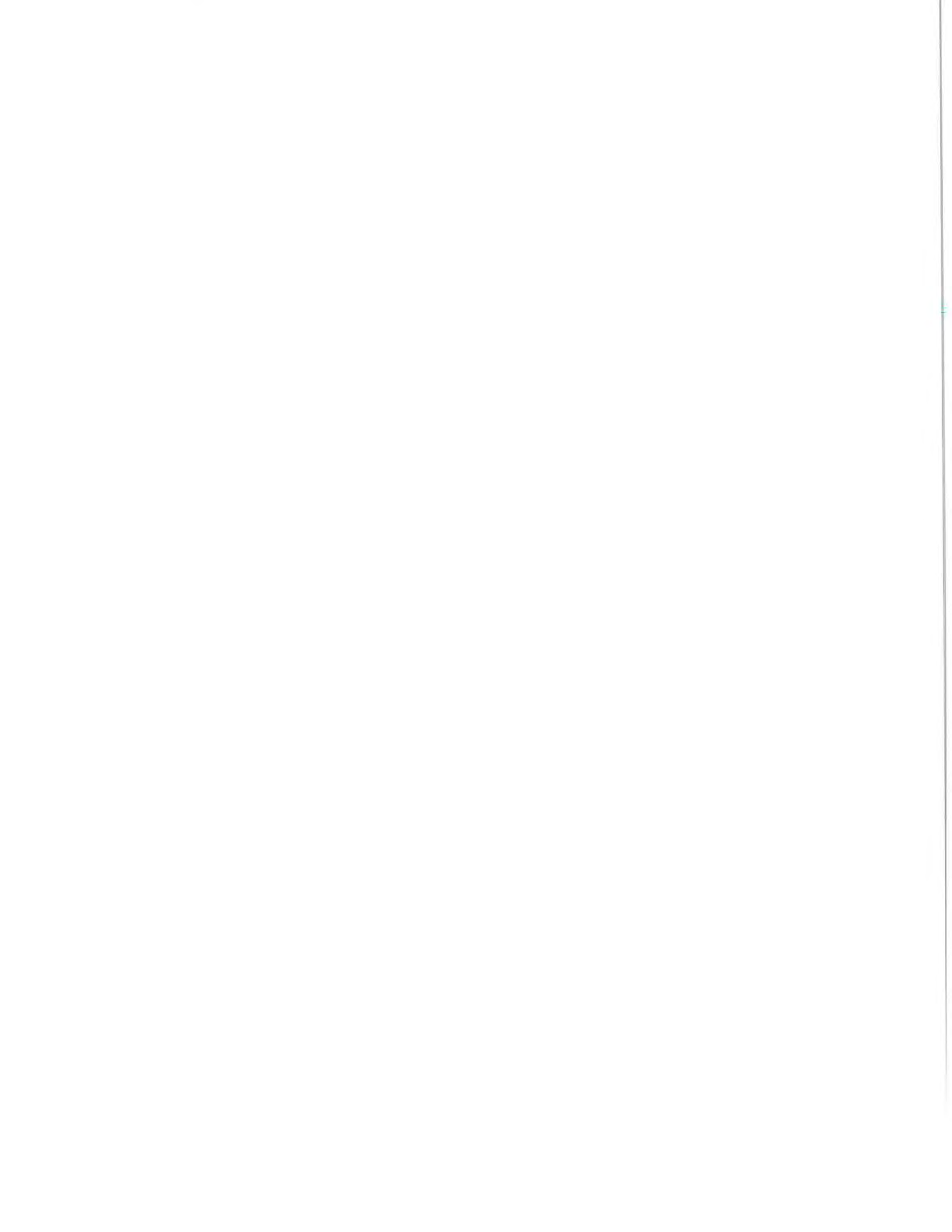
## Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 13	FY 14	FY 15	FY 16	FY 17	FY 18 (9/30/18)
RAD	Documents/ Transactions Coded	N/A	N/A	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	9,125/ 30,869,828
	Documents/Pages Processed in Paper Automation System	N/A	N/A	N/A	N/A	8,139/ 684,747	8,822/ 902,572
	Documents/Pages Reviewed	87,190/ 10,490,683	68,282/ 9,211,502	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726
	Letters sent	15,543	10,220	13,433	13,253	14,796	13,763
	Telephone calls handled	14,254	10,673	11,822	12,362	11,634	13,036
	Referrals	88	59	91	43	95	46
	AF Cases RTB/FD	194/184	70/55	191/159	83/33	163/168	95/23
Audit	<b>(b) (7)(E)</b>						
ADRO							
OAR	Cases Received	26	6	35	12	29	8
	Cases Closed (FD)	31	5	32	11	32	10



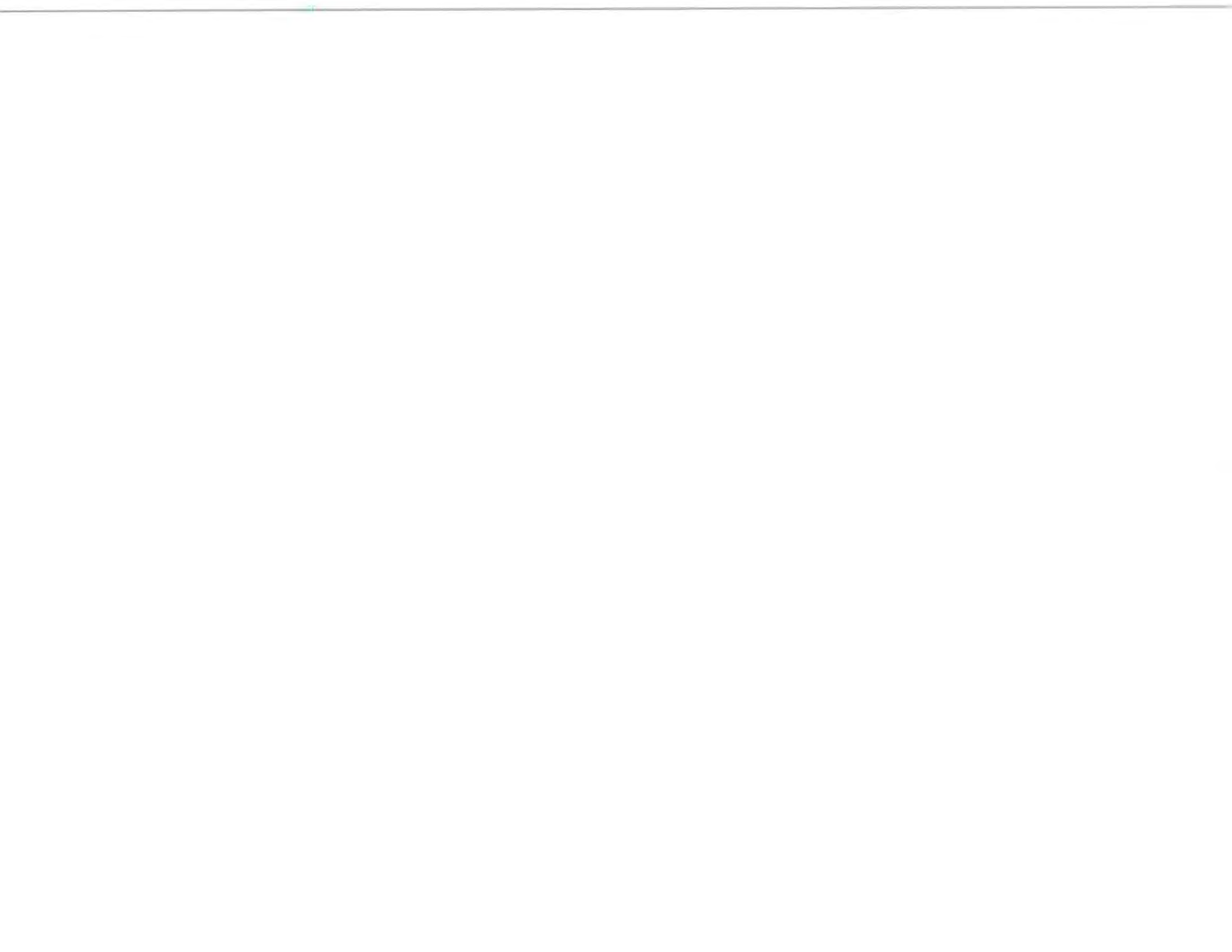










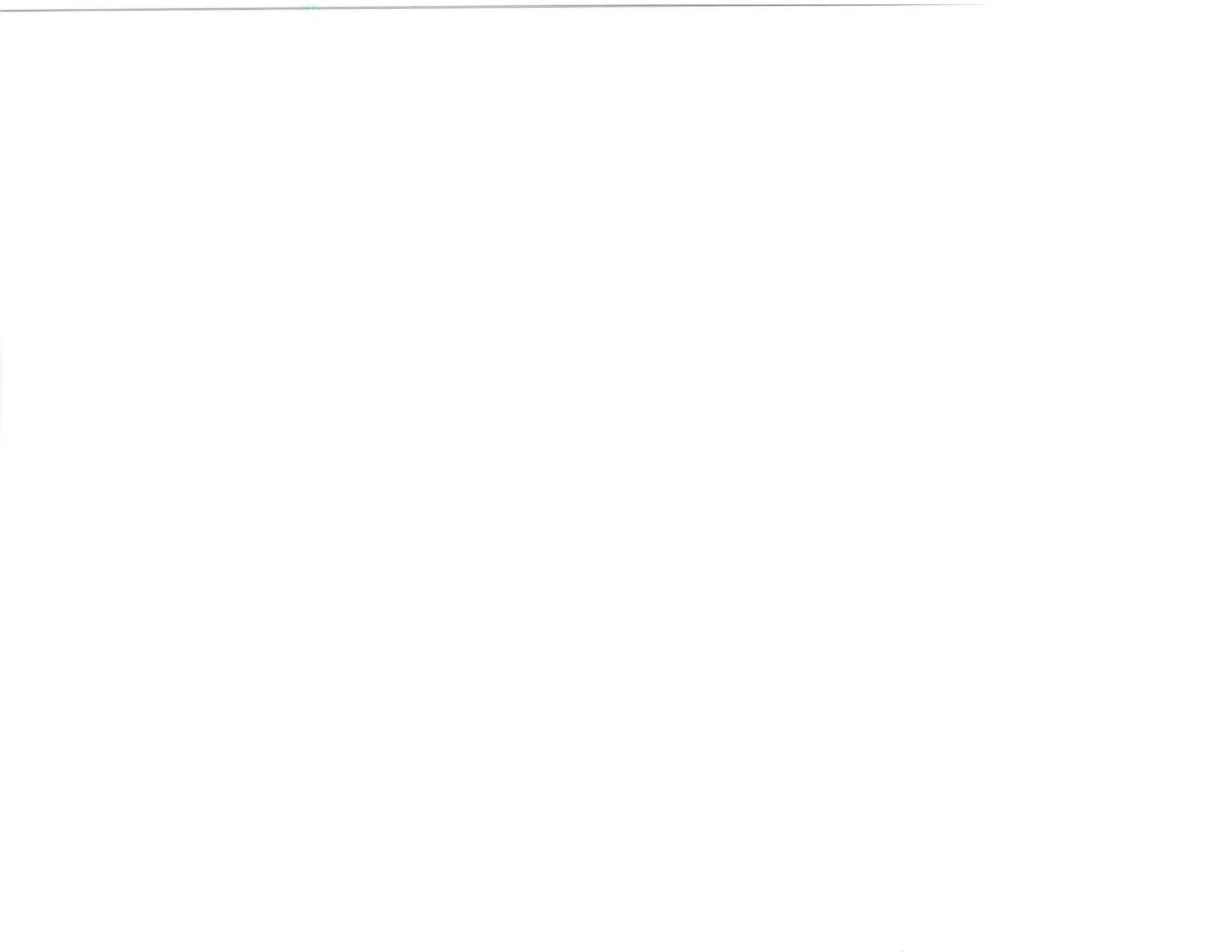


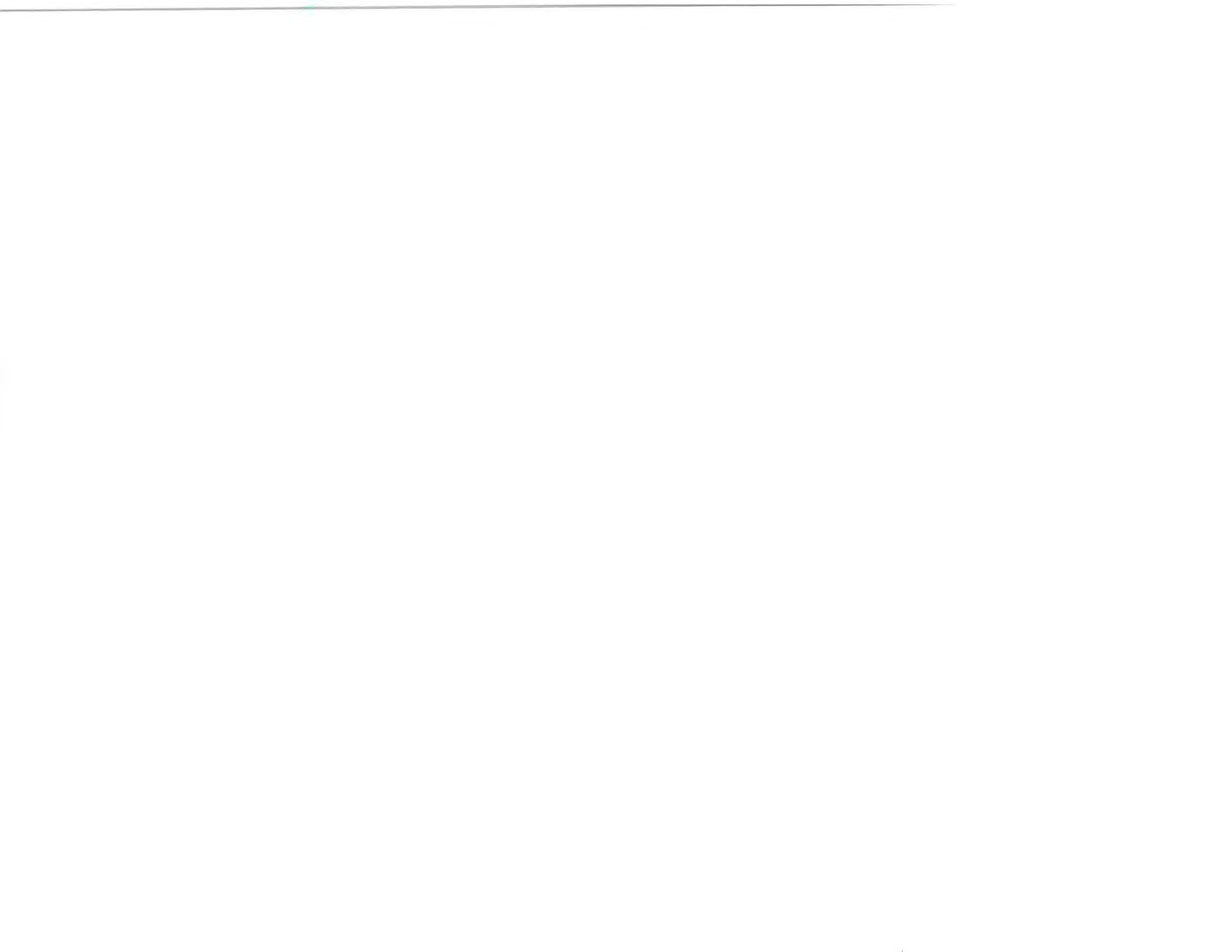














## AF Performance Goals

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Print Date: October 31, 2018

Selected Parameters:

Office: Both

Start Date: 10/01/2017

End Date: 09/30/2018

\*Exception: YES



# AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
<b>Processed</b>						
2017	rECop)	H_S_P_UNAUTH	N	01/31/2018	04/17/2018	
2017	YE	H_S_P_UNAUTH	N	01/31/2018	03/26/2018	
2017	M12	P_UNAUTH	N	12/20/2017	02/12/2018	
2017	M11	P_UNAUTH	N	11/20/2017	01/08/2018	
2017	M10	P_UNAUTH	N	10/20/2017	11/27/2017	
2017	Q3	H_S_P	N	10/15/2017	11/27/2017	
2017	M9	P_UNAUTH	N	09/20/2017	11/06/2017	
2017	M8	P_UNAUTH	N	08/20/2017	10/02/2017	
2018	30SG	AUTH	N	07/30/2018	09/24/2018	
2018	M7	P_UNAUTH	N	07/20/2018	09/17/2018	
2018	Q2	H_S_P_UNAUTH	N	07/15/2018	09/11/2018	
2018	M6	P_UNAUTH	N	06/20/2018	07/30/2018	
2018	12P	AUTH	Y	05/31/2018	07/23/2018	
2018	12P	AUTH	Y	05/24/2018	07/23/2018	
2018	M5	P_UNAUTH	N	05/20/2018	07/16/2018	
2018	12P	AUTH	Y	05/03/2018	06/25/2018	
2018	12P	AUTH	Y	04/26/2018	06/18/2018	
2018	M4	P_UNAUTH	N	04/20/2018	06/11/2018	
2018	Q1	H_S_P_UNAUTH	N	04/15/2018	06/11/2018	
2018	M3	P_UNAUTH	N	03/20/2018	05/15/2018	
2018	12P	AUTH	Y	02/22/2018	04/23/2018	
2018	M2	P_UNAUTH	N	02/20/2018	04/30/2018	

Total AF Reports Processed	22
Average Processing Days	53.95
Percentage to Goal	90.91%

(b) (7)(E)

**Processed - No committees**

2017	30SG	AUTH	N	01/11/2018	03/07/2018	
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(b) (7)(E)



# AF Performance Goals

(Confidential and Sensitive)

## Processed - No committees

## Action Date

Year	Committee	Type	Status	Action Date	Approval Date
2017	30SG	AUTH	N	12/07/2017	01/29/2018
2017	12SG	AUTH	Y	11/30/2017	01/08/2018
2017	12SG	AUTH	Y	10/26/2017	12/14/2017
2017	M10	P_UNAUTH	Y	10/20/2017	11/20/2017
2017	Q3	H_S_P	Y	10/15/2017	12/05/2017
2017	12SPR	AUTH	Y	09/14/2017	11/06/2017
2018	12P	AUTH	Y	07/30/2018	09/24/2018
2018	12P	AUTH	Y	07/26/2018	09/24/2018
2018	12SG	AUTH	Y	07/26/2018	09/24/2018
2018	12SP	AUTH	Y	07/26/2018	09/24/2018
2018	12P	AUTH	Y	07/23/2018	09/17/2018
2018	12P	AUTH	Y	07/21/2018	09/17/2018
2018	12PR	AUTH	Y	07/12/2018	09/05/2018
2018	12P	AUTH	Y	07/08/2018	09/05/2018
2018	12PR	AUTH	Y	07/05/2018	08/30/2018
2018	12SG	AUTH	Y	06/18/2018	07/30/2018
2018	12P	AUTH	Y	06/14/2018	07/30/2018
2018	12PR	AUTH	Y	06/14/2018	07/30/2018
2018	12P	AUTH	Y	06/07/2018	07/23/2018
2018	12PR	AUTH	Y	06/07/2018	07/23/2018
2018	30SG	AUTH	N	05/24/2018	07/16/2018
2018	12P	AUTH	Y	05/10/2018	06/26/2018
2018	12PR	AUTH	Y	05/10/2018	06/26/2018
2018	12C	AUTH	Y	05/07/2018	06/25/2018
2018	12C	AUTH	Y	05/06/2018	06/25/2018
2018	12C	AUTH	Y	05/02/2018	06/25/2018
2018	12C	AUTH	Y	04/29/2018	06/25/2018
2018	12SP	AUTH	Y	04/26/2018	06/21/2018
2018	12C	AUTH	Y	04/23/2018	06/18/2018
2018	12C	AUTH	Y	04/18/2018	06/11/2018
2018	12C	AUTH	Y	04/16/2018	06/11/2018
2018	12SG	AUTH	Y	04/12/2018	06/05/2018
2018	30SG	AUTH	N	04/12/2018	06/05/2018
2018	12C	AUTH	Y	04/10/2018	06/05/2018
2018	12C	AUTH	Y	04/09/2018	06/05/2018
2018	12C	AUTH	Y	04/02/2018	05/24/2018
2018	12C	AUTH	Y	03/12/2018	05/02/2018
2018	12P	AUTH	Y	03/08/2018	05/02/2018
2018	12C	AUTH	Y	03/05/2018	04/30/2018

(b) (7)(E)





# AF Performance Goals

(Confidential and Sensitive)

## Processed - No committees

					Action Date
2018	12SG	AUTH	Y	03/01/2018	04/30/2018
2018	12C	AUTH	Y	02/26/2018	04/26/2018
2018	12SP	AUTH	Y	02/15/2018	04/12/2018

(b) (7)(E)

Total AF Reports Processed-No Committees	43
Average Processing Days	52.70
(b) (7)(E)	
Percentage to Goal	100.00%

Total AF Reports	65
Average Processing Days	53.12
(b) (7)(E)	
Percentage to Goal	96.92%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters  
 RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters  
 processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H  
 sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



# AF Performance Goals

(Confidential and Sensitive)

## OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2017	Q1	3328	C00476457	09/05/2017	10/25/2017	50	Y
2016	48H	3336	C00607762	10/31/2017	12/28/2017	58	Y
2017	MY	3343	C00630012	10/24/2017	12/20/2017	57	Y
2017	MY	3344	C00623355	10/30/2017	12/14/2017	45	Y
2017	Q3	3350	C00440909	01/09/2018	03/07/2018	57	Y
2017	Q3	3351	C00640219	12/28/2017	02/21/2018	55	Y
2018	12P	3367	C00659110	06/11/2018	06/28/2018	17	Y
2014	48H	3373	C00512236	07/26/2018	08/30/2018	35	Y

Total Challenges Processed 8

Average Processing Days 46.75

Total Reports Processed within 60 Days 8

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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3-11-2019

2019 FEB 28 PM 3:34

February 28, 2019

**SENSITIVE**

**MEMORANDUM**

AGENDA DOCUMENT NO. X-19-06

AGENDA ITEM

For meeting of 3-19-19

TO: The Commission

THROUGH: Alec Palmer  
Staff Director

*AP*

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista Roche *KJR*  
Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2019 – 4<sup>th</sup> Quarter Highlights (10/1/18 – 12/31/18) & FY Statistical Overview

---

### **Administrative Fine Program (Office of Administrative Review)**

During the first quarter of FY 2019, the Commission processed 83 Reason to Believe (RTB) findings. OAR received 6 challenges and processed 5 Reviewing Officer Recommendations (ROR). The Commission reviewed final determination recommendations in 15 cases, made a final determination that the respondents in all 15 cases violated 52 U.S.C. § 30104(a), and assessed \$61,636 in civil penalties. The Commission also collected \$73,766 in fine payments and prepared 16 cases for public release.

(b) (7)(E)  
(b) (7)(E)


Additionally, OAR forwarded 100%

of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

During the first quarter, the Reviewing Officer worked with OCIO and OCFO to enhance financial reports to accommodate OCFO reporting requirements and increase efficiency in reconciliation. The Reviewing Officer also participated on hiring panels and provided assistance to ADRO to handle an increased caseload.







# Status of Compliance

FY 2019  
(10/1/2018 - 12/31/2018)





**Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data**

**Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent**

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19 (12/31/18)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%	93%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	99.0%	99.9%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%

## Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

## Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2019 Performance Goals	Status 12/31/18
<p>RAD staff collaborated with OGC on guidance for the filing community following the <i>CREW v. FEC</i> decision.</p>	<p>The guidance has been placed on the “Other Filers” section of the FEC website and was also included in the weekly FEC Digest on October 5, 2018.</p>
<p>RAD staff collaborated with ADRO, Audit, OGC and the Information Division on the Audit/ADRO Education Group for 2014 cycle audit referrals, as directed by the Commission.</p>	<p>Negotiated settlement agreements were approved by the Commission on February 11, 2019. RAD, ADRO and Audit are in the process of developing the training material. The training will be conducted within the next couple months.</p>
<p>RAD staff collaborated with ADRO, OGC and the Audit Division on proposed recommendations for the 2019-2020 RAD Review and Referral Procedures.</p>	<p>The Commission approved the recommendations on December 13, 2018.</p>

**Strategic Objective 2: Promote Compliance with the FECA and Related Statutes**

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

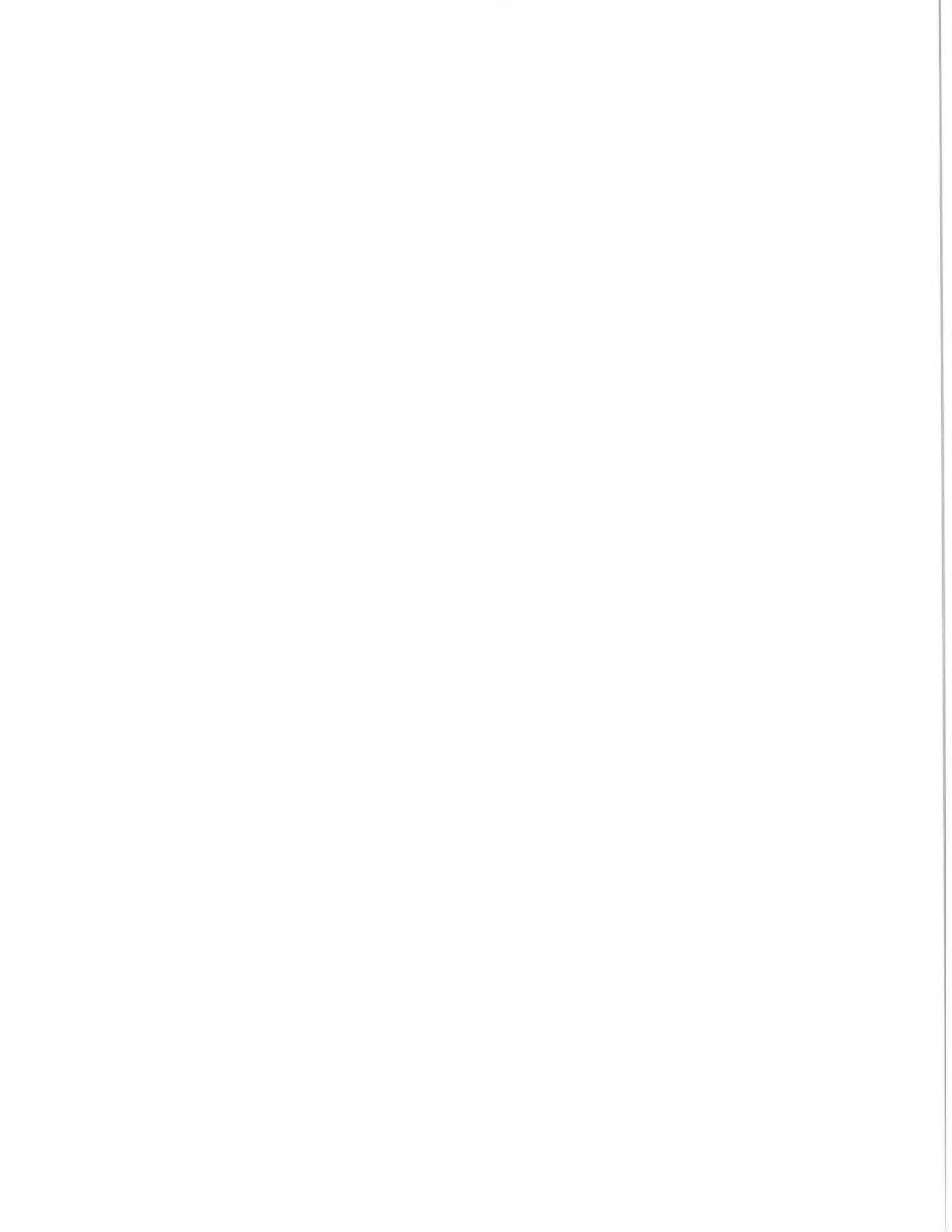
Performance Goals	FY 14	FY 15	FY 16	FY 17	FY 18	FY 19 (12/31/18)
RAD to review 75% of reports within 90 days of receipt	85.4%	79.3%	92.9%	76.6%	92.2%	95.6%
RAD to send 75% of RFAs within 40 days of report review	84%	92%	92%	88%	88%	88%
(b) (7)(E)	96.8%	93.5%	100%	96.2%	96.9%	95.5%
(b) (7)(E)	93%	43%	56%	25%	46%	N/A <sup>(b) (7)(A)</sup>
OAR to circulate 60% of Reviewing Officer Recommendations within 60 days	100%	97%	81.8%	96.67%	100%	100%
(b) (7)(E)	95%	100%	100%	100%	99%	100%

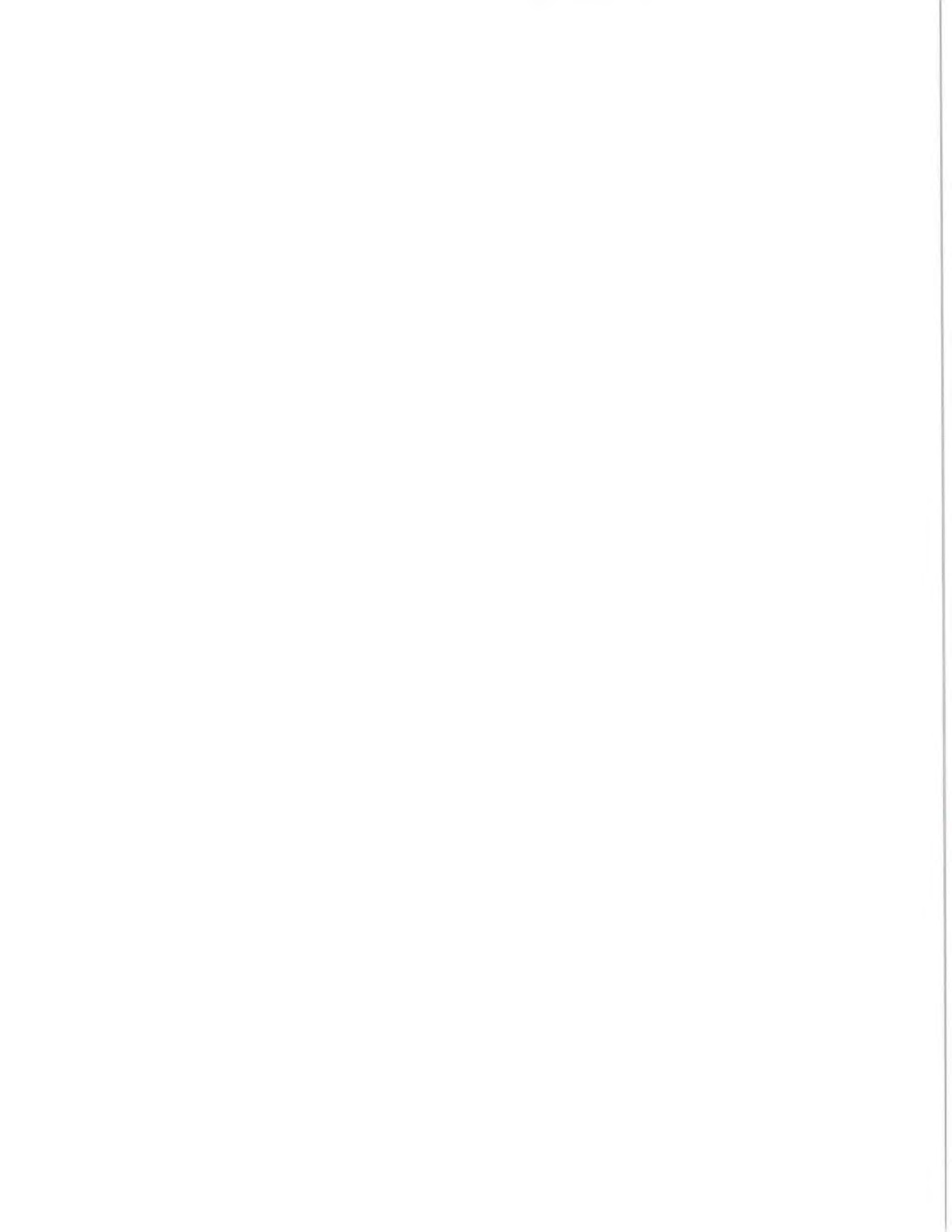
(b) (7)(A)

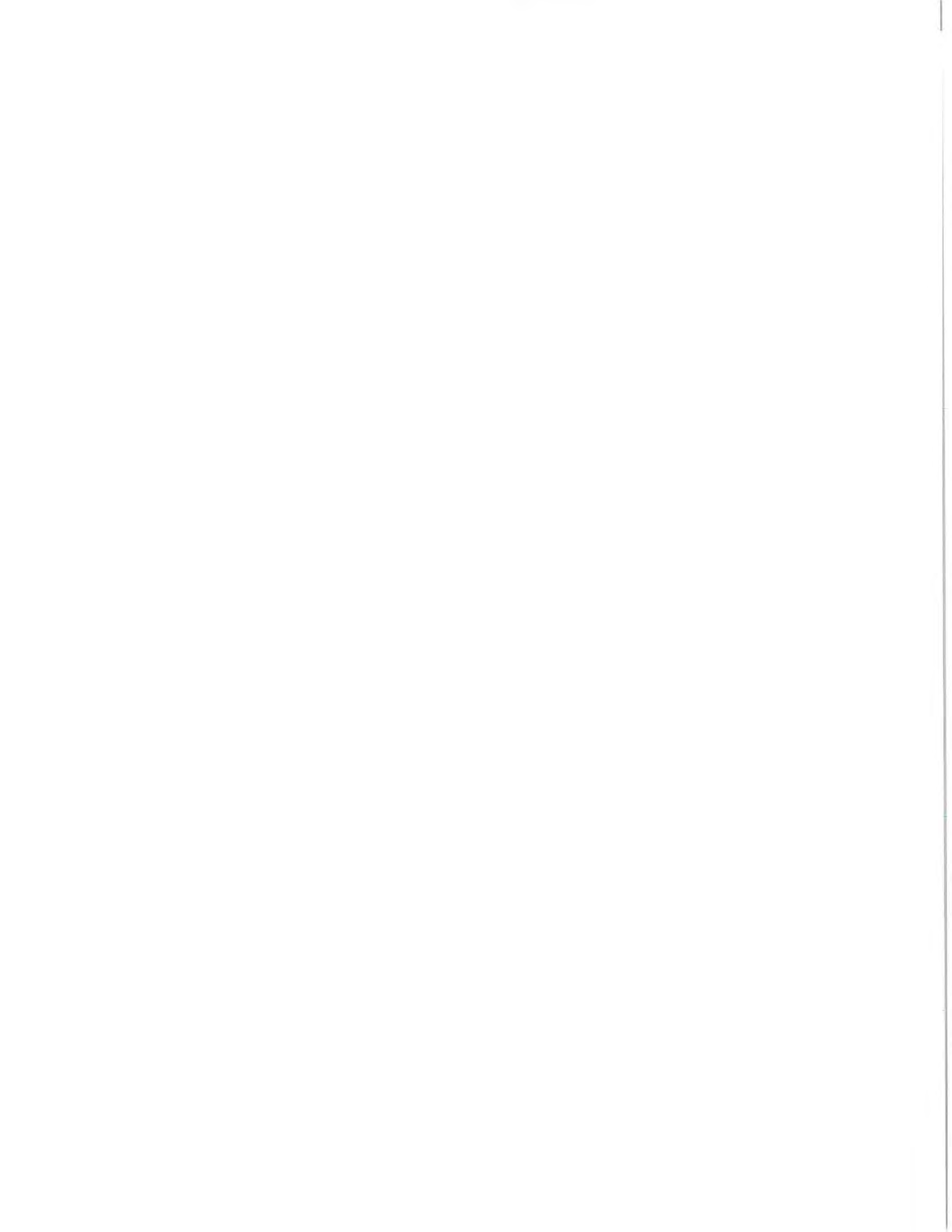
Strategic Objective 4: Foster a Culture of High Performance

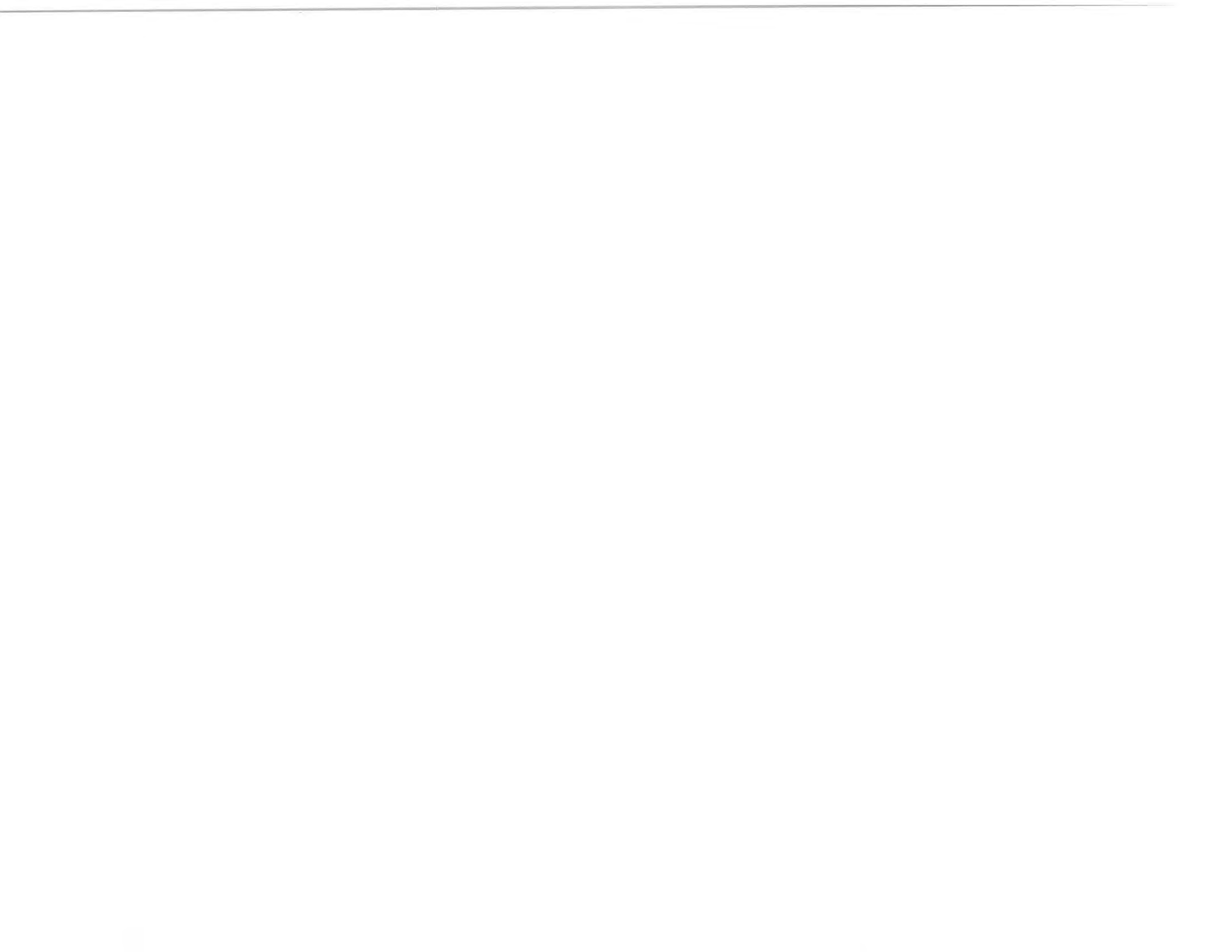
Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 14	FY 15	FY 16	FY 17	FY 18	FY 19 (12/31/18)
RAD	Documents/ Transactions Coded	N/A	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	9,125/ 30,869,828	1,984/ 9,907,405
	Documents/Pages Processed in Paper Automation System	N/A	N/A	N/A	8,139/ 684,747	8,822/ 902,572	1,920/ 19,706
	Documents/Pages Reviewed	68,282/ 9,211,502	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	24,267/ 7,952,625
	Letters sent	10,220	13,433	13,253	14,796	13,763	4,015
	Telephone calls handled	10,673	11,822	12,362	11,634	13,036	4,447
	Referrals	59	91	43	95	46	6
	AF Cases RTB/FD	70/55	191/159	83/33	163/168	95/23	83/12
Audit	<b>(b) (7)(E)</b>						
ADRO							
OAR	Cases Received	6	35	12	29	8	6
	Cases Closed (FD)	5	32	11	32	10	3





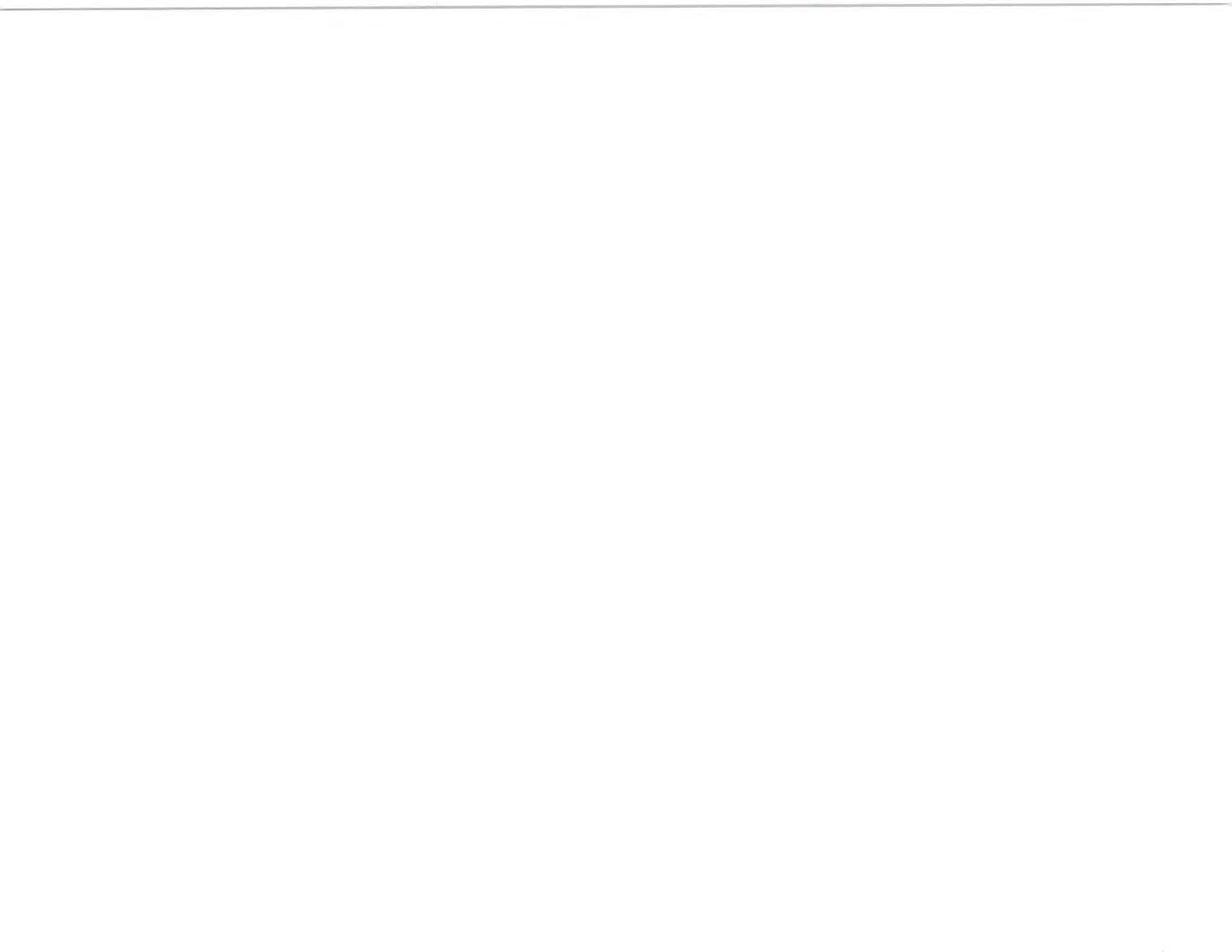


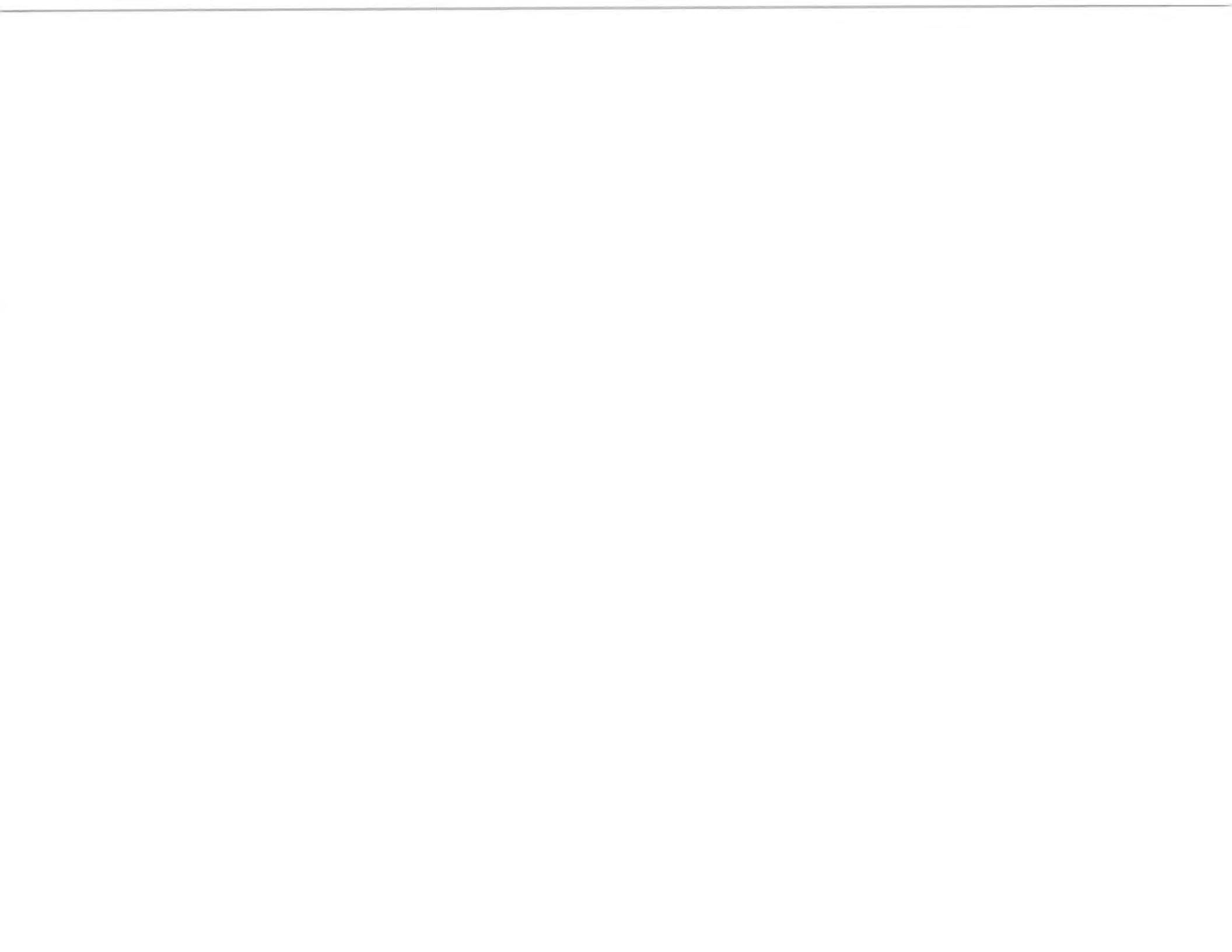


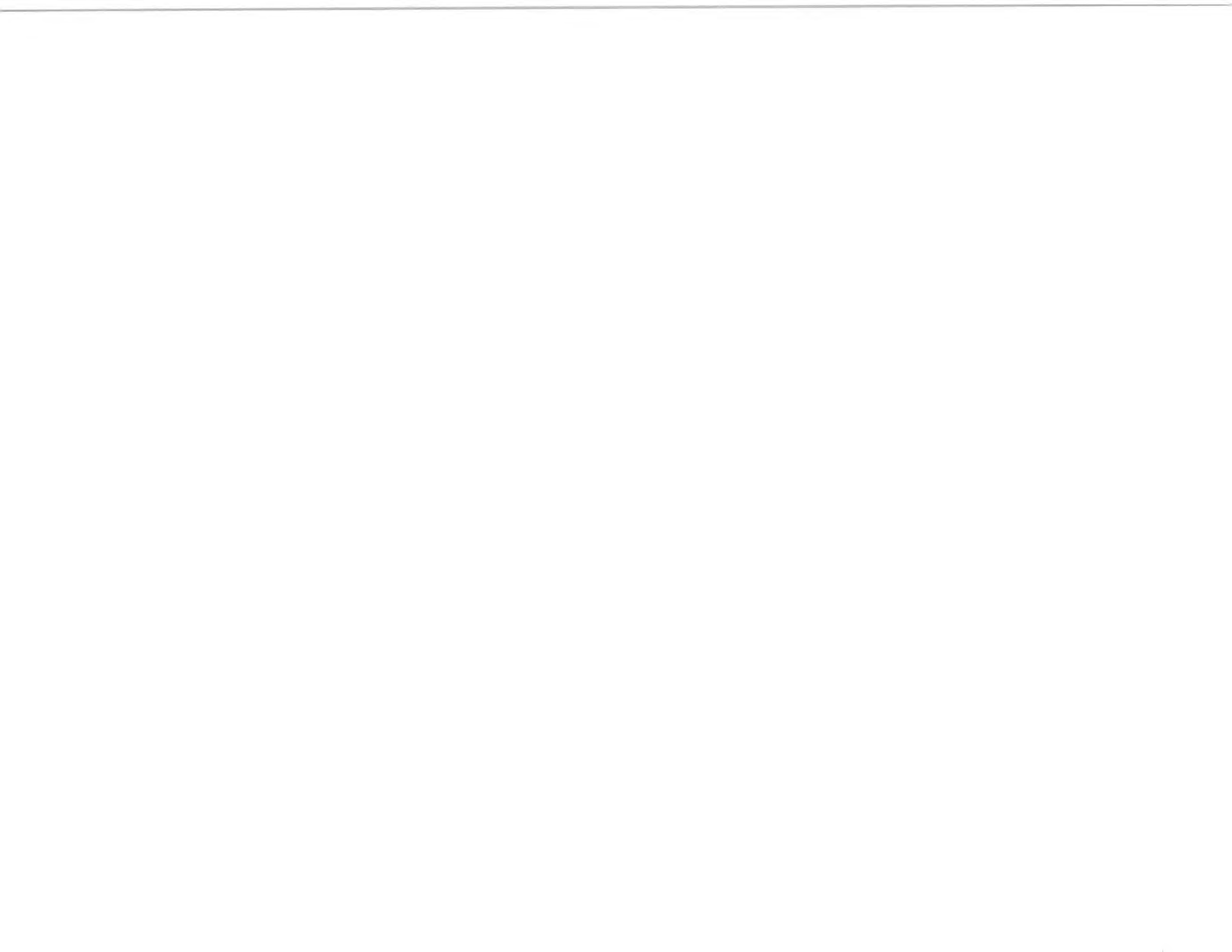


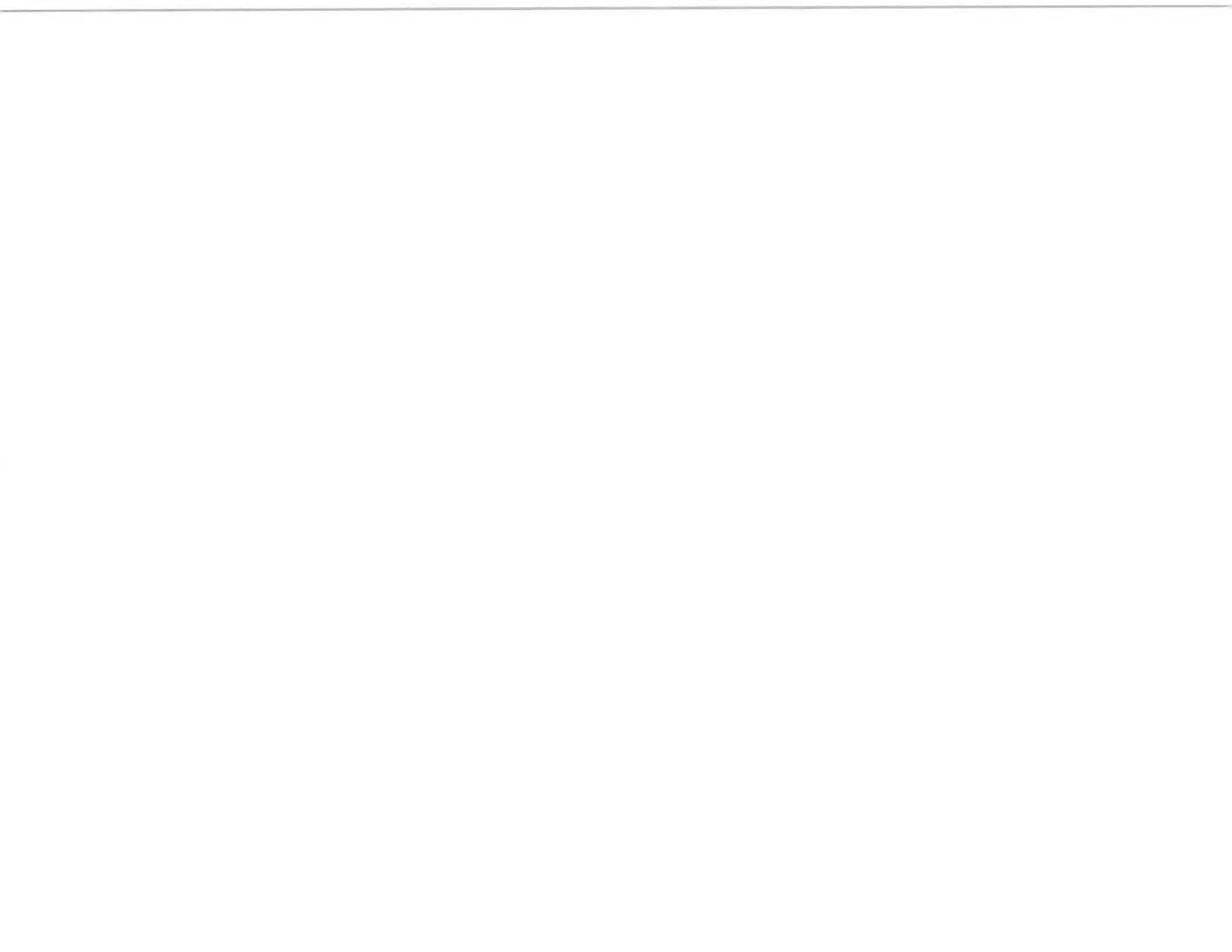














## AF Performance Goals

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Print Date: February 28, 2019

Selected Parameters:

Office: Both

Start Date: 10/01/2018

End Date: 12/31/2018

\*Exception: YES



# AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
<b>Processed</b>						
2018	12G	AUTH	Y	10/25/2018	12/10/2018	
2018	12G	UNAUTH_M	Y	10/25/2018	12/10/2018	
2018	M10	P_UNAUTH	Y	10/20/2018	12/04/2018	
2018	Q3	H_S_P_UNAUTH	N	10/15/2018	11/27/2018	
2018	Q3	H_S_P_UNAUTH	Y	10/15/2018	11/26/2018	
2018	M9	P_UNAUTH	N	09/20/2018	10/29/2018	
2018	12P	AUTH	Y	08/30/2018	10/22/2018	
2018	12P	AUTH	Y	08/23/2018	10/22/2018	
2018	12P	AUTH	Y	08/16/2018	10/15/2018	
2018	12P	AUTH	Y	08/02/2018	10/01/2018	

Total AF Reports Processed 10

Average Processing Days 49.40

(b) (7)(E)

Percentage to Goal 100.00%

## Processed - No committees

Year	Type	Description	Election Sensitive	Due Date	Action Date	(b) (7)(E)
2018	12SGR	AUTH	Y	11/15/2018	12/17/2018	
2018	12GR	AUTH	Y	11/08/2018	12/11/2018	
2018	12SG	AUTH	Y	10/25/2018	12/04/2018	
2018	M10	P_UNAUTH	N	10/20/2018	11/29/2018	
2018	30SG	AUTH	N	09/06/2018	10/22/2018	
2018	12P	AUTH	Y	08/31/2018	10/22/2018	
2018	12P	AUTH	Y	08/25/2018	10/22/2018	
2018	M8	P_UNAUTH	N	08/20/2018	10/15/2018	
2018	12PR	AUTH	Y	08/16/2018	10/15/2018	
2018	12P	AUTH	Y	08/13/2018	10/09/2018	
2018	12P	AUTH	Y	08/09/2018	10/09/2018	
2018	12PR	AUTH	Y	08/02/2018	10/01/2018	





# AF Performance Goals

(Confidential and Sensitive)

Total AF Reports Processed-No Committees	12
Average Processing Days	49.58
(b) (7)(E)	
Percentage to Goal	91.67%

Total AF Reports	22
Average Processing Days	49.50
(b) (7)(E)	
Percentage to Goal	95.45%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters  
RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters  
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H  
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



# AF Performance Goals

(Confidential and Sensitive)

## OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2018	Q1	3397	C00368415	08/08/2018	10/02/2018	55	Y
2018	Q2	3455	C00381517	11/01/2018	12/21/2018	50	Y
2018	Q2	3460	C00638825	10/25/2018	11/06/2018	12	Y
2018	Q2	3463	C00634873	10/29/2018	11/08/2018	10	Y
2018	Q2	3471	C00637728	10/30/2018	12/19/2018	50	Y

Total Challenges Processed 5

Average Processing Days 35.40

Total Reports Processed within 60 Days 5

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters



## AF Performance Goals

---

Print Date: February 28, 2019

Selected Parameters:

Office: Both

Start Date: 10/01/2018

End Date: 12/31/2018

\*Exception: YES



# AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
<b>Processed</b>						
2018	12G	AUTH	Y	10/25/2018	12/10/2018	
2018	12G	UNAUTH_M	Y	10/25/2018	12/10/2018	
2018	M10	P_UNAUTH	Y	10/20/2018	12/04/2018	
2018	Q3	H_S_P_UNAUTH	N	10/15/2018	11/27/2018	
2018	Q3	H_S_P_UNAUTH	Y	10/15/2018	11/26/2018	
2018	M9	P_UNAUTH	N	09/20/2018	10/29/2018	
2018	12P	AUTH	Y	08/30/2018	10/22/2018	
2018	12P	AUTH	Y	08/23/2018	10/22/2018	
2018	12P	AUTH	Y	08/16/2018	10/15/2018	
2018	12P	AUTH	Y	08/02/2018	10/01/2018	

Total AF Reports Processed 10

Average Processing Days 49.40

(b) (7)(E)

Percentage to Goal 100.00%

## Processed - No committees

Year	Type	Description	Election Sensitive	Due Date	Action Date	(b) (7)(E)
2018	12SGR	AUTH	Y	11/15/2018	12/17/2018	
2018	12GR	AUTH	Y	11/08/2018	12/11/2018	
2018	12SG	AUTH	Y	10/25/2018	12/04/2018	
2018	M10	P_UNAUTH	N	10/20/2018	11/29/2018	
2018	30SG	AUTH	N	09/06/2018	10/22/2018	
2018	12P	AUTH	Y	08/31/2018	10/22/2018	
2018	12P	AUTH	Y	08/25/2018	10/22/2018	
2018	M8	P_UNAUTH	N	08/20/2018	10/15/2018	
2018	12PR	AUTH	Y	08/16/2018	10/15/2018	
2018	12P	AUTH	Y	08/13/2018	10/09/2018	
2018	12P	AUTH	Y	08/09/2018	10/09/2018	
2018	12PR	AUTH	Y	08/02/2018	10/01/2018	



# AF Performance Goals

(Confidential and Sensitive)

Total AF Reports Processed-No Committees	12
Average Processing Days	49.58
(b) (7)(E)	
Percentage to Goal	91.67%

Total AF Reports	22
Average Processing Days	49.50
(b) (7)(E)	
Percentage to Goal	95.45%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters  
RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters  
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H  
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



# AF Performance Goals

(Confidential and Sensitive)

## OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2018	Q1	3397	C00368415	08/08/2018	10/02/2018	55	Y
2018	Q2	3455	C00381517	11/01/2018	12/21/2018	50	Y
2018	Q2	3460	C00638825	10/25/2018	11/06/2018	12	Y
2018	Q2	3463	C00634873	10/29/2018	11/08/2018	10	Y
2018	Q2	3471	C00637728	10/30/2018	12/19/2018	50	Y

Total Challenges Processed 5

Average Processing Days 35.40

Total Reports Processed within 60 Days 5

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

## Administrative Fine Program Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19 (12/31/18)
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$140,542	\$61,636

(b) (7)(E)



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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FEDERAL ELECTION COMMISSION  
2019 APR 30 PM 12:31

**SENSITIVE**

April 30, 2019

**MEMORANDUM**

AGENDA DOCUMENT NO. X19-15  
AGENDA ITEM  
For the meeting of May 7, 2019

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista Roche *KJR*  
Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2019 – 2<sup>nd</sup> Quarter Highlights (1/1/19 – 3/31/19) & FY Statistical Overview

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### **Administrative Fine Program (Office of Administrative Review)**

During the second quarter of FY 2019, the Commission processed 96 Reason to Believe (RTB) findings. OAR received 14 challenges and processed 12 Reviewing Officer Recommendations (ROR). The Commission reviewed final determination recommendations in 2 cases, made a final determination that the respondents in these cases violated


52 U.S.C. § 30104(a), and assessed \$7,550 in civil penalties. The Commission also collected \$63,662 in fine payments and prepared 2 cases for public release.

(b) (7)(E)

(b) (7)(E) Additionally, OAR forwarded 92% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).<sup>2</sup>







# Status of Compliance

FY 2019  
(10/1/2018 - 3/31/2019)



**Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data**

**Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent**

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19 (3/31/19)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%	92.6%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	99.0%	99%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%

## Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

## Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2019 Performance Goals	Status 3/31/19
<p>RAD staff collaborated with OCIO and the Information Division on the development of IE reporting examples and the creation of an “Other Filers” section for the FEC website.</p>	<p>The “Other Filers” section and the IE reporting examples were posted on the website in February and March 2019.</p>
<p>RAD staff collaborated with ADRO, Audit and the Information Division on the development of training materials for the 2014 cycle Audit/ADRO Education Committees.</p>	<p>Training sessions were scheduled and held in April and May 2019.</p>
<p>RAD staff collaborated with the Electronic Filing Office to update the Password Assignment System in order to add extra security measures.</p>	<p>The updated Password Assignment System was rolled out on 4/3/2019. All electronic filers were made aware of the changes via email.</p>

**Strategic Objective 2: Promote Compliance with the FECA and Related Statutes**

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

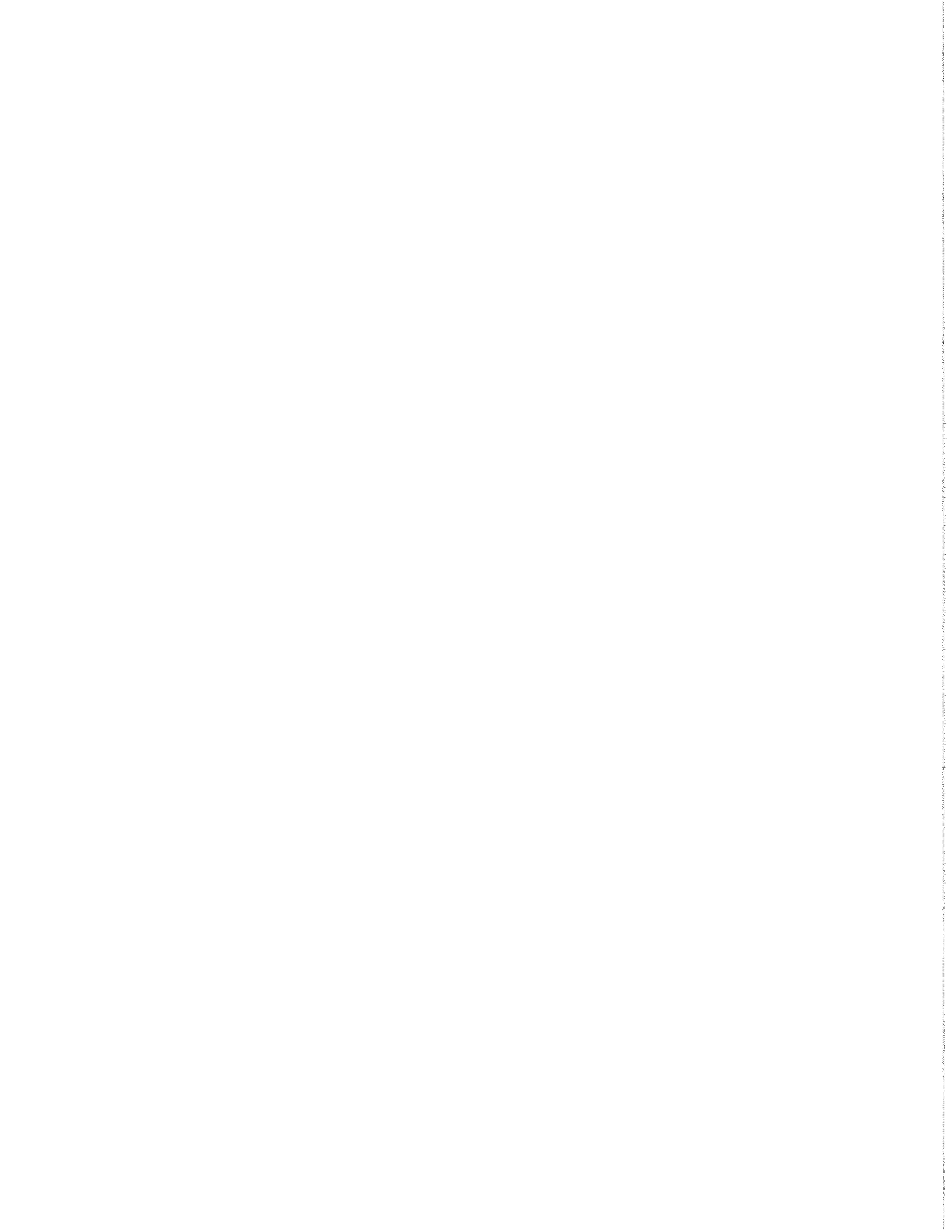
Performance Goals	FY 14	FY 15	FY 16	FY 17	FY 18	FY 19 (3/31/19)
RAD to review 75% of reports within 90 days of receipt	85.4%	79.3%	92.9%	76.6%	92.2%	80.6%
RAD to send 75% of RFAs within 40 days of report review	84%	92%	92%	88%	88%	85%
(b) (7)(E)	96.8%	93.5%	100%	96.2%	96.9%	84.9%
(b) (7)(E)	93%	43%	56%	25%	45%	100%
OAR to circulate 60% of Reviewing Officer Recommendations within 60 days	100%	97%	81.8%	96.67%	100%	94.12%
(b) (7)(E)	95%	100%	100%	100%	99%	22%/100%

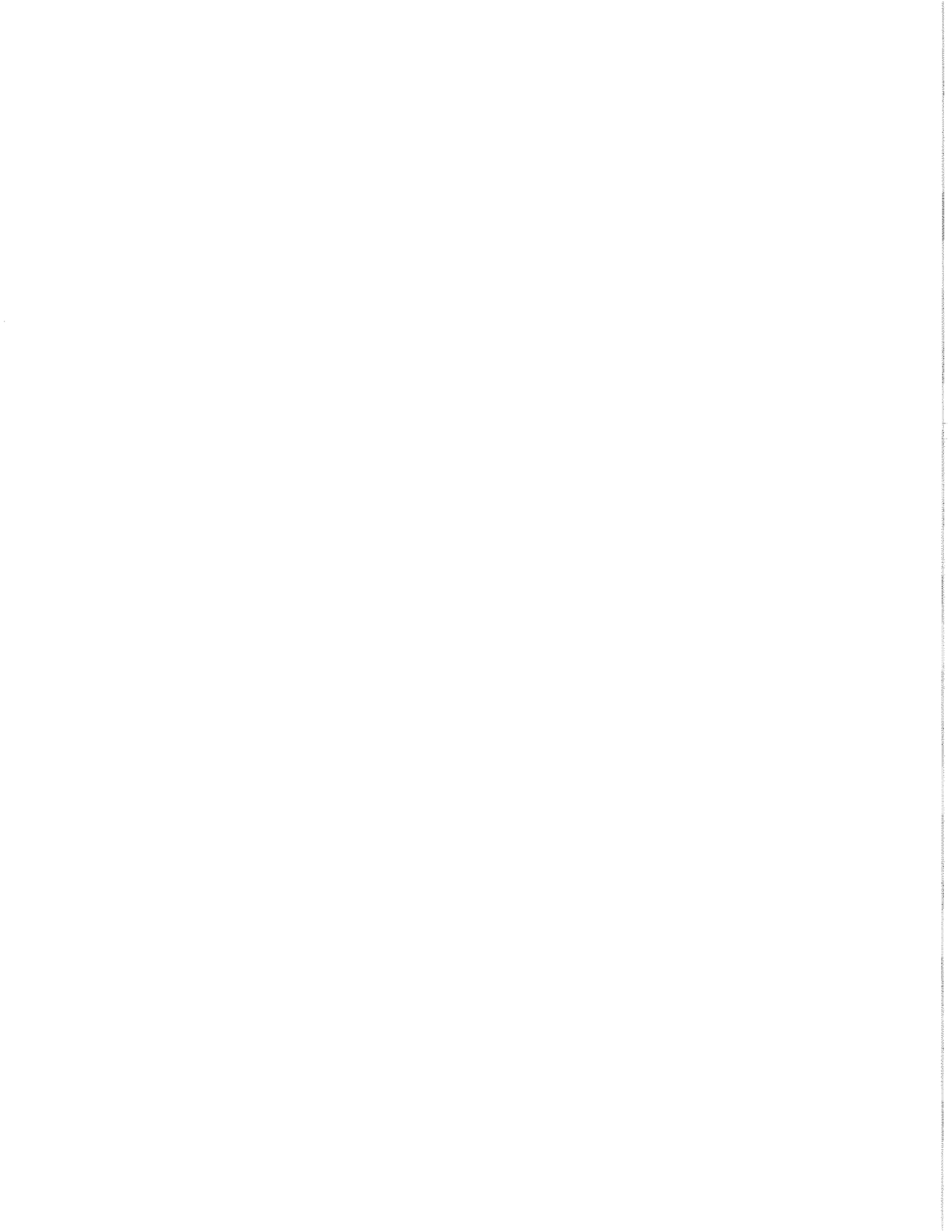


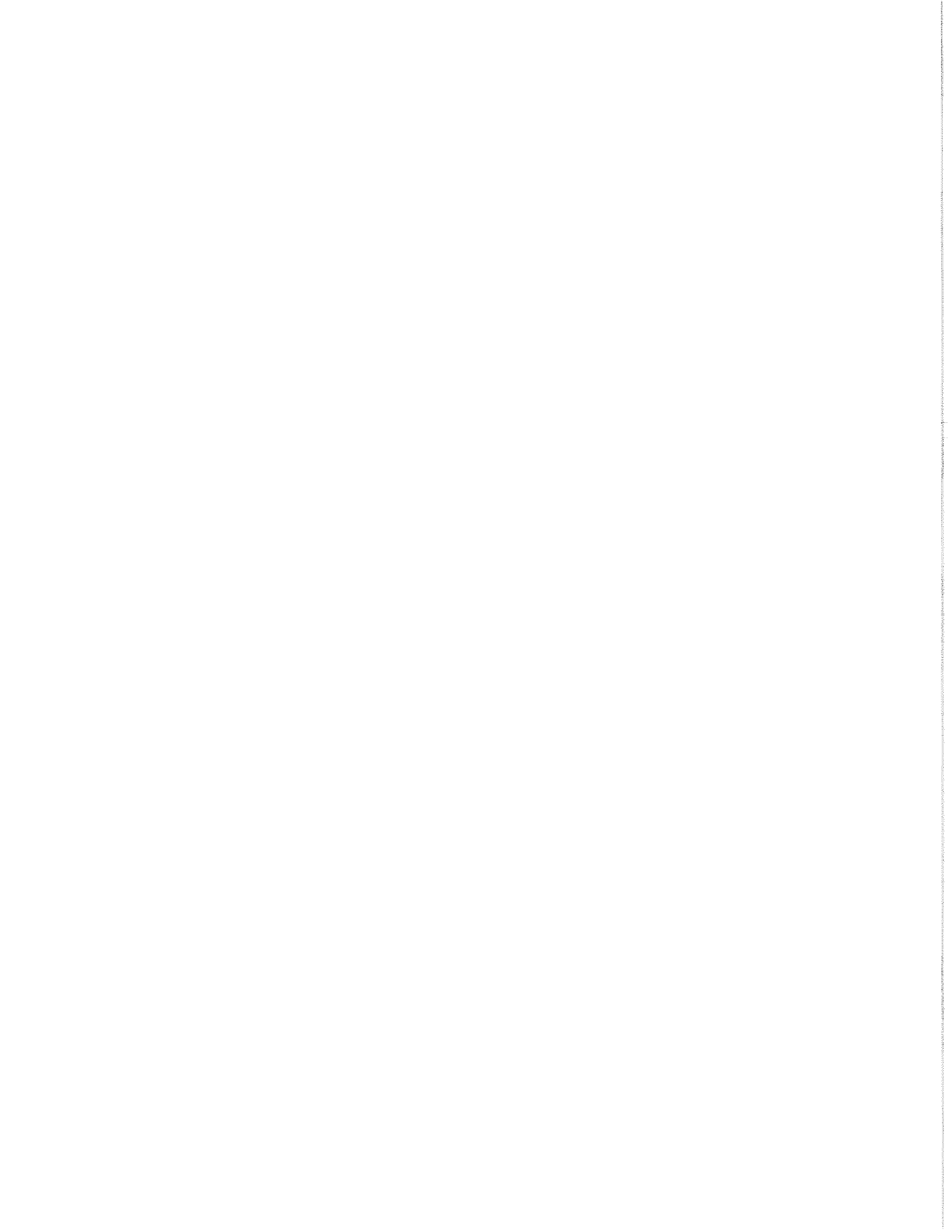
Strategic Objective 4: Foster a Culture of High Performance

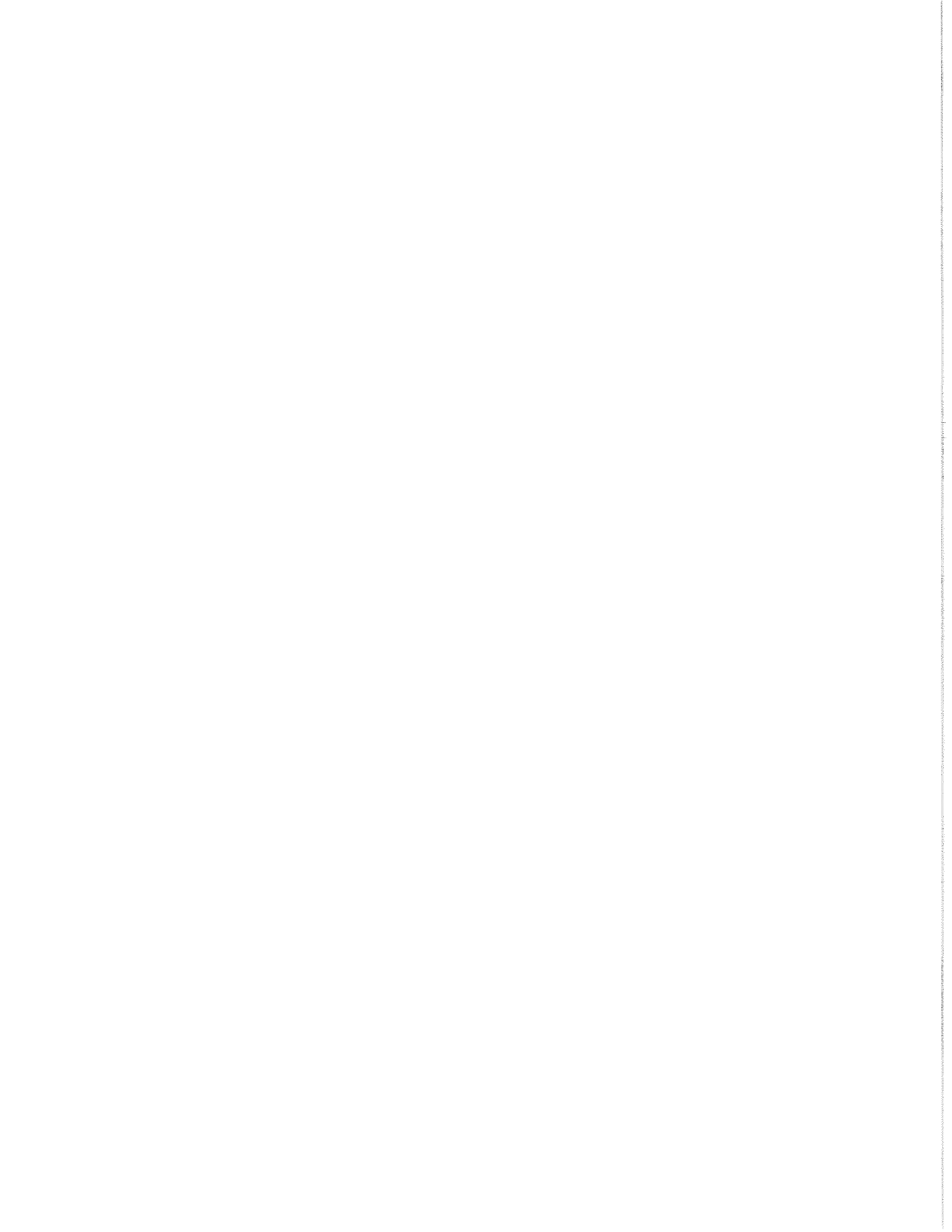
Performance Goal 1: Foster a workplace that delivers results

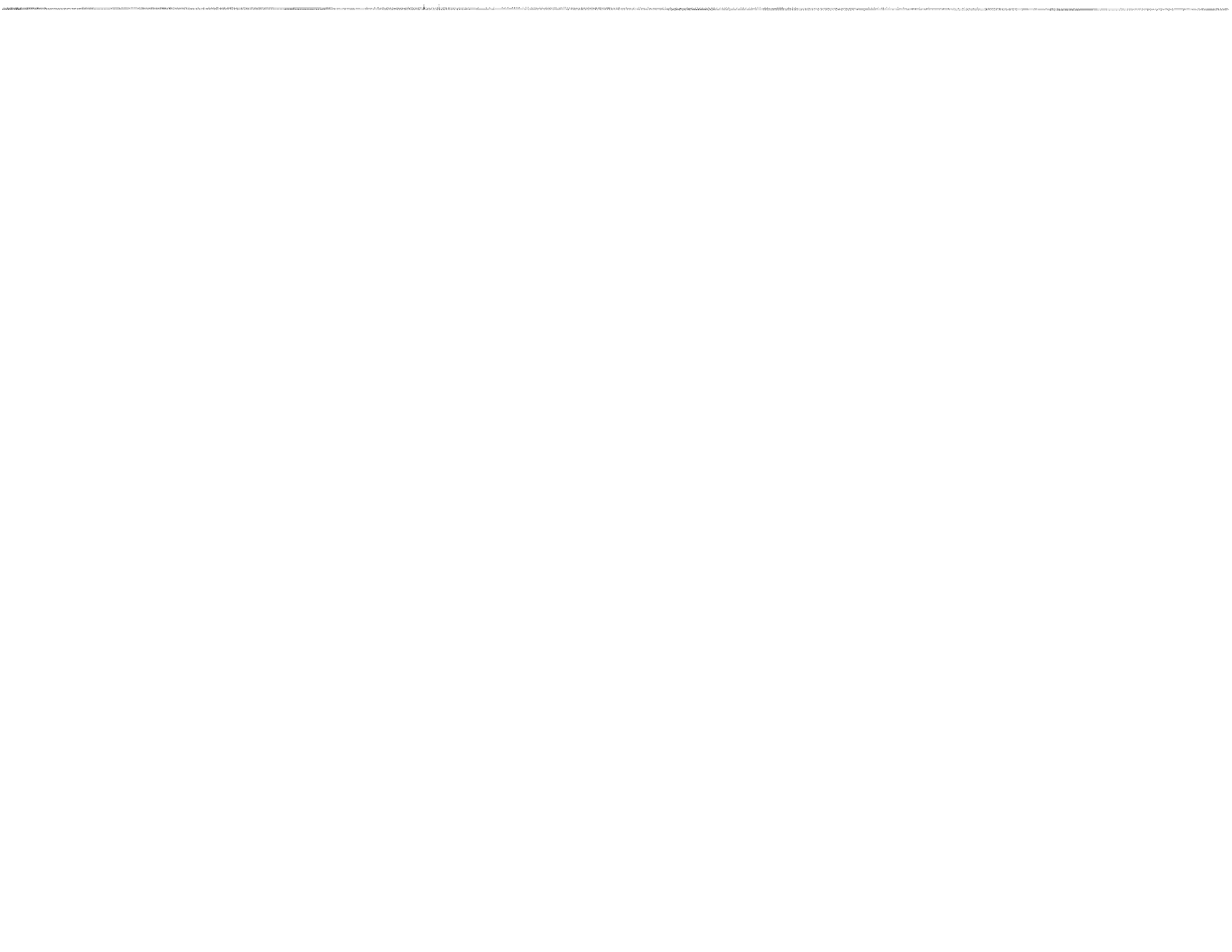
Office	Deliverable	FY 14	FY 15	FY 16	FY 17	FY 18	FY 19 (3/31/19)
RAD	Documents/ Transactions Coded	N/A	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	9,125/ 30,869,828	3,413/ 15,473,982
	Documents/Pages Processed in Paper Automation System	N/A	N/A	N/A	8,139/ 684,747	8,822/ 902,572	3,279/ 32,255
	Documents/Pages Reviewed	68,282/ 9,211,502	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	52,179/ 12,833,405
	Letters sent	10,220	13,433	13,253	14,796	13,763	7,283
	Telephone calls handled	10,673	11,822	12,362	11,634	13,036	6,776
	Referrals	59	91	43	95	46	17
	AF Cases RTB/FD	70/55	191/159	83/33	163/168	95/23	179/11
Audit	<b>(b) (7)(E)</b>						
ADRO							
OAR	Cases Received	6	35	12	29	8	20
	Cases Closed (FD)	5	32	11	32	10	4

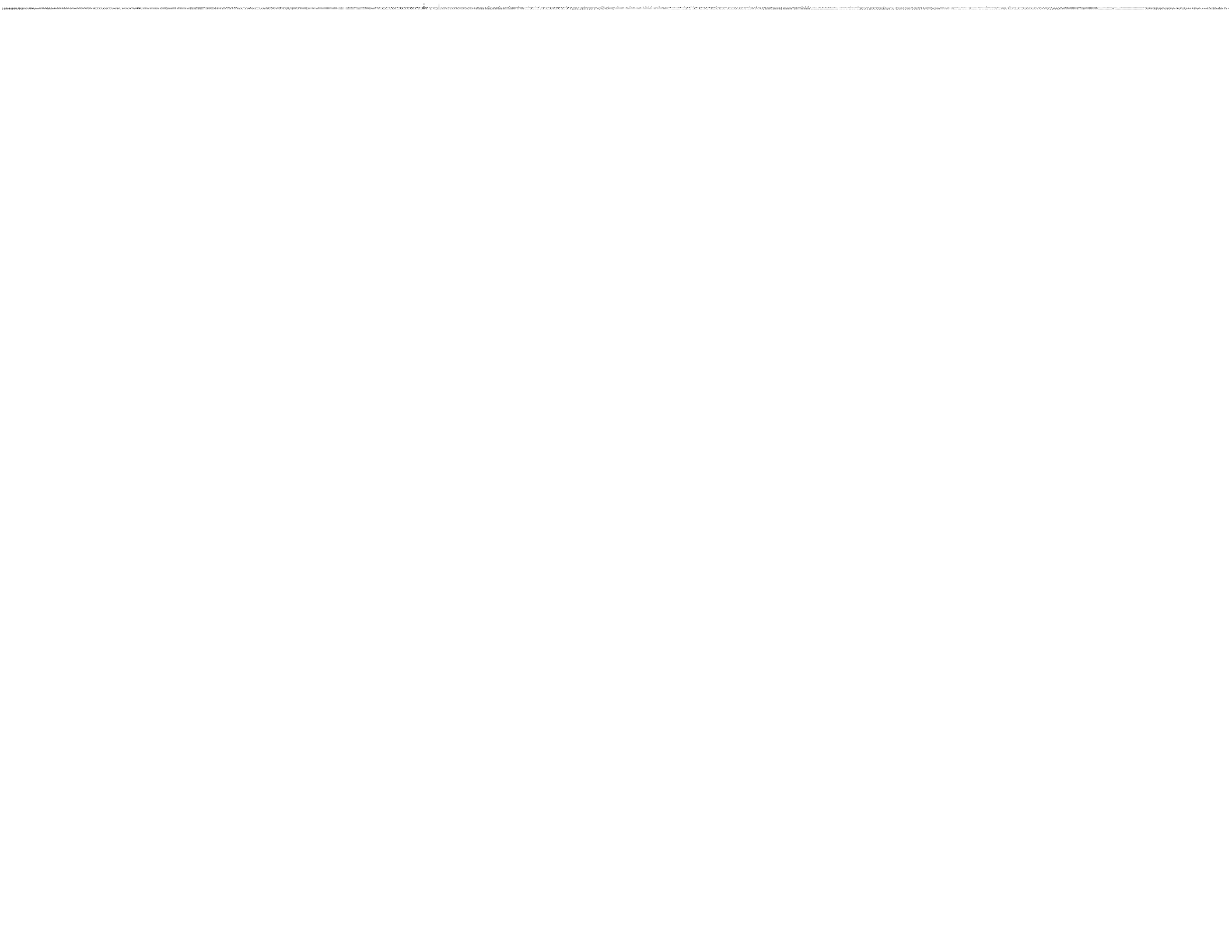


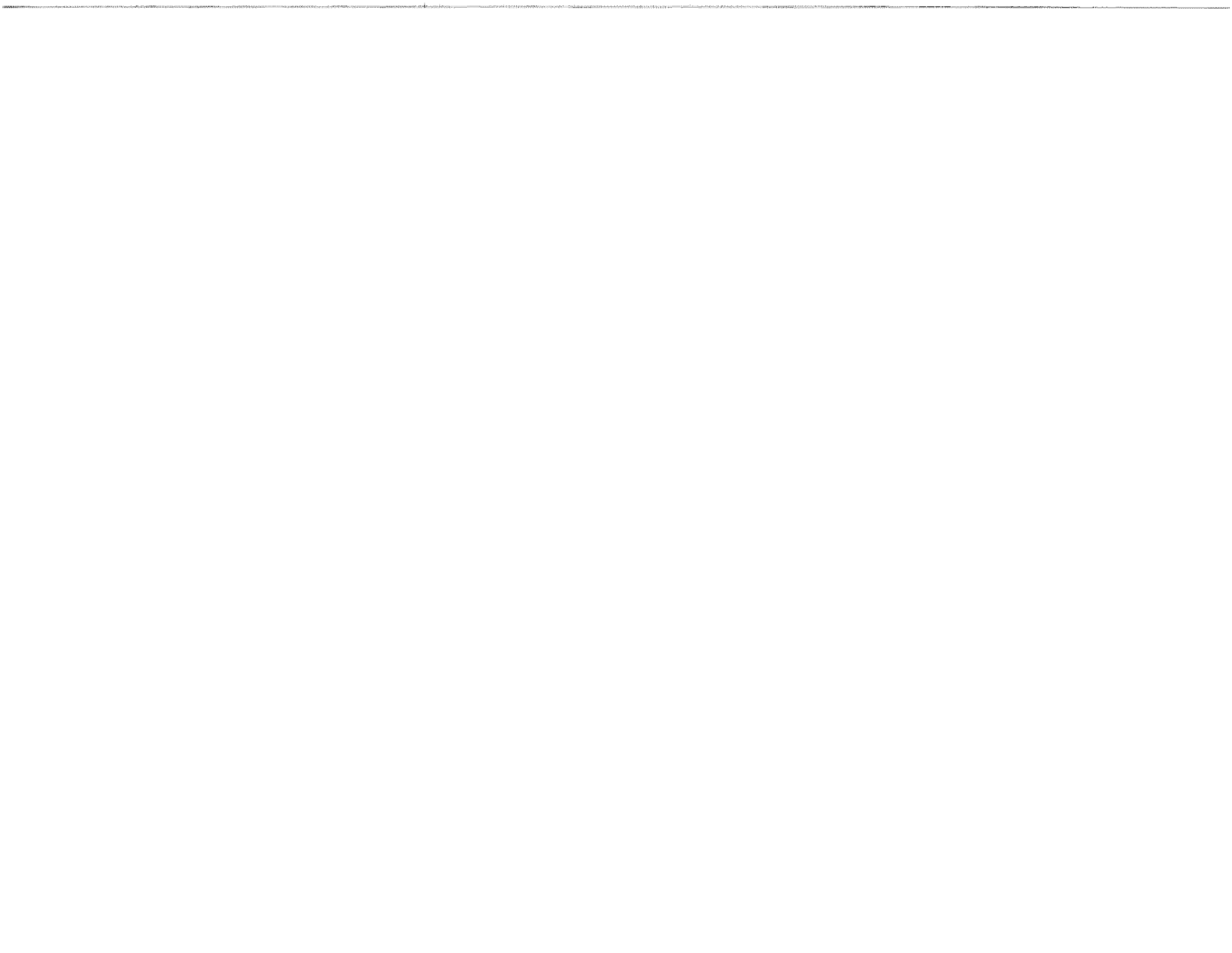




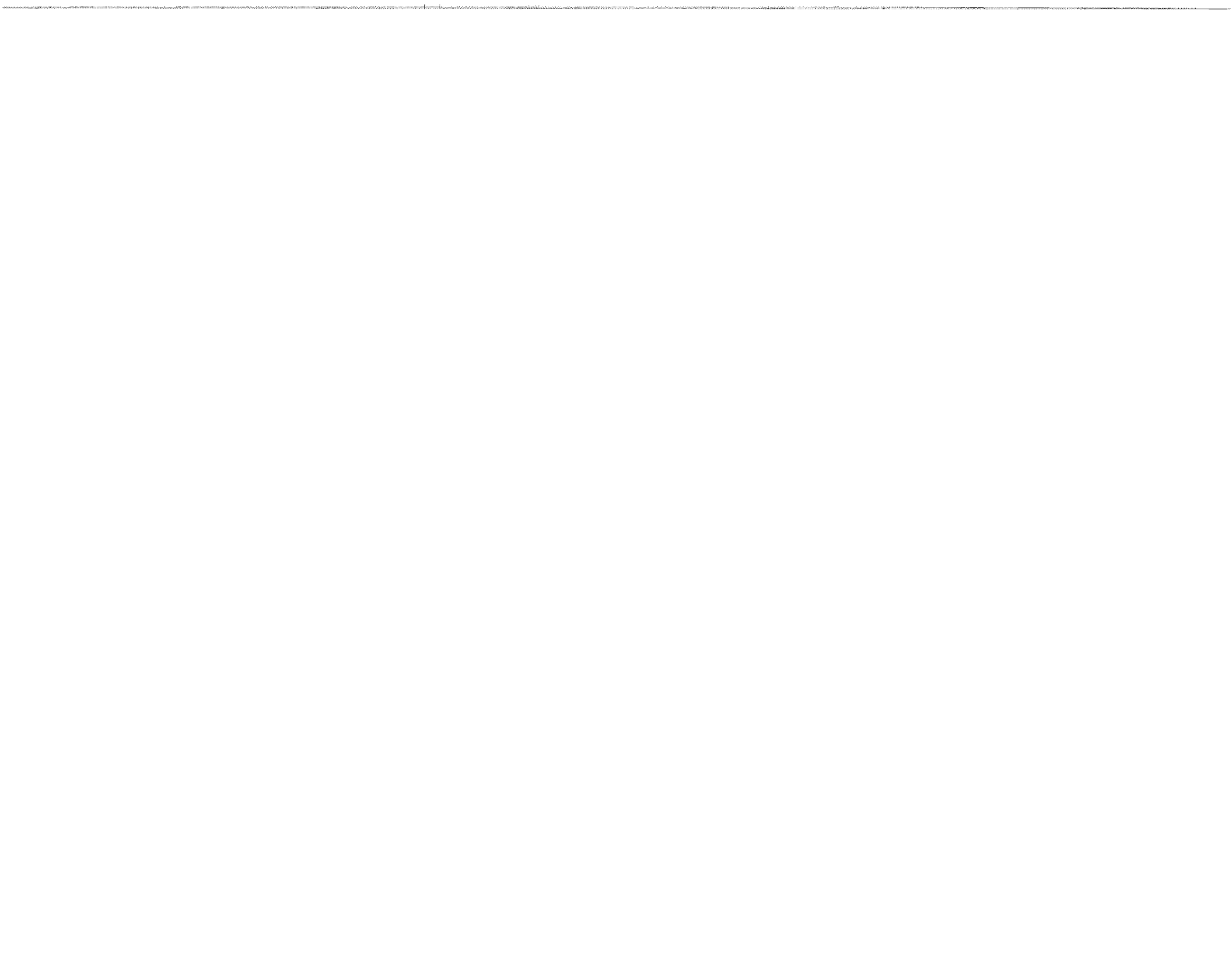


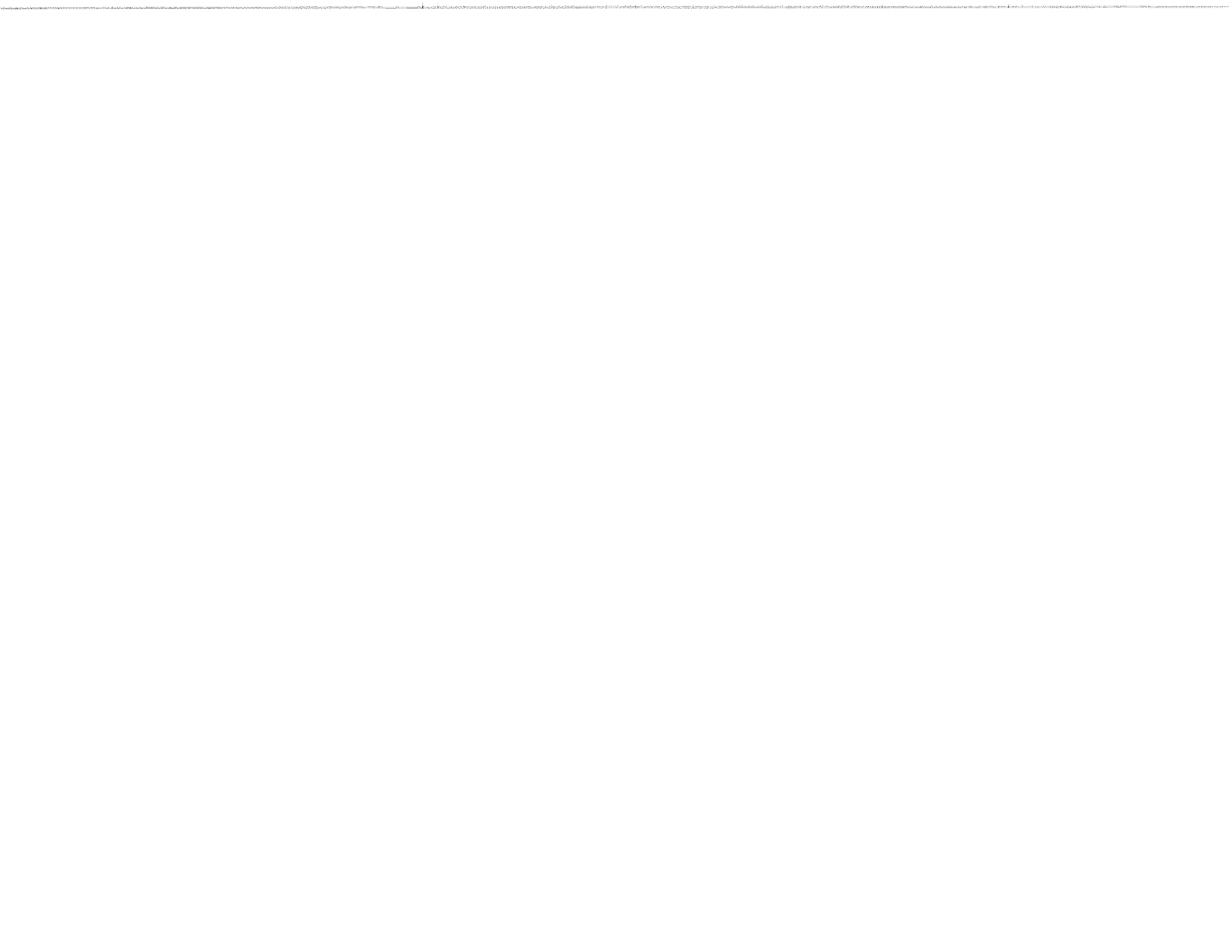


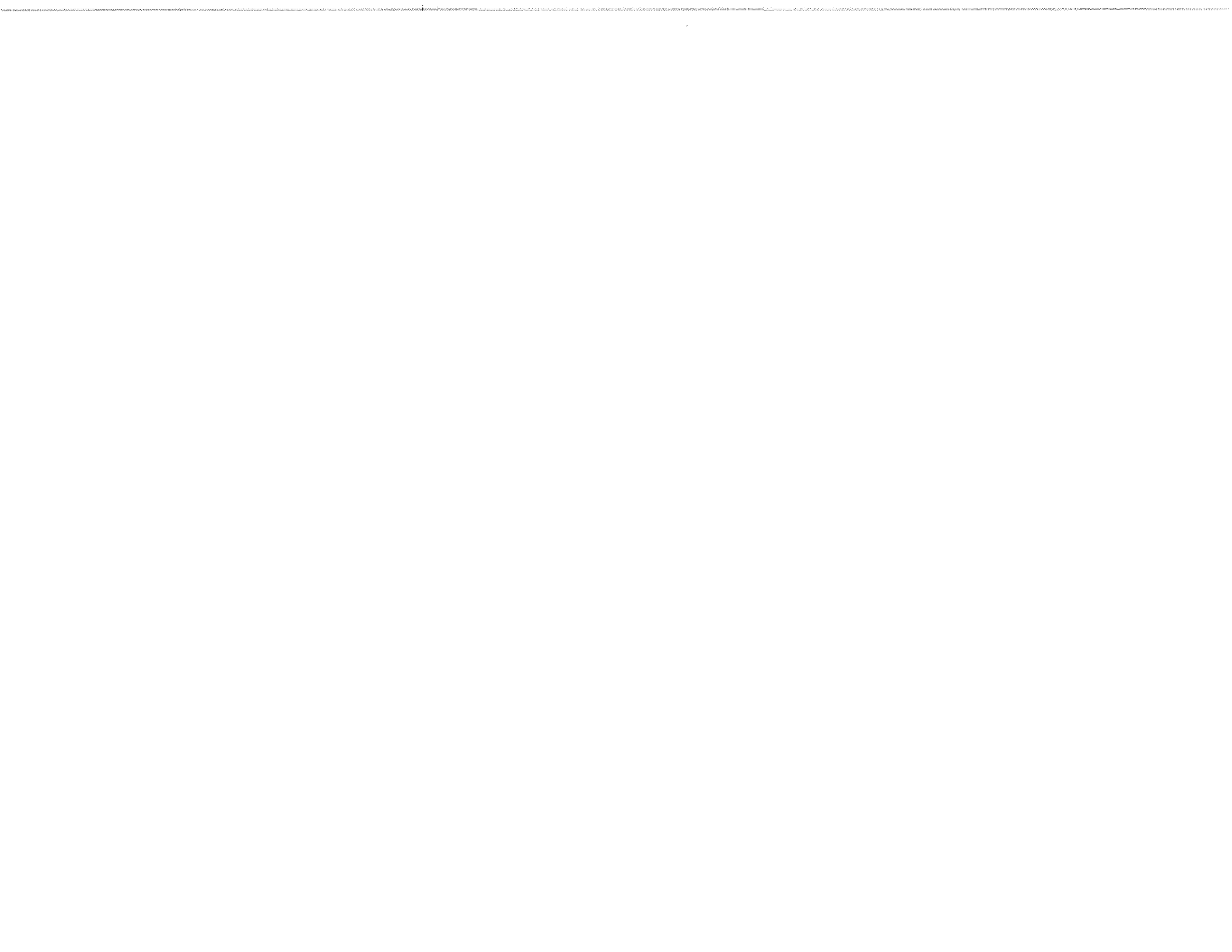


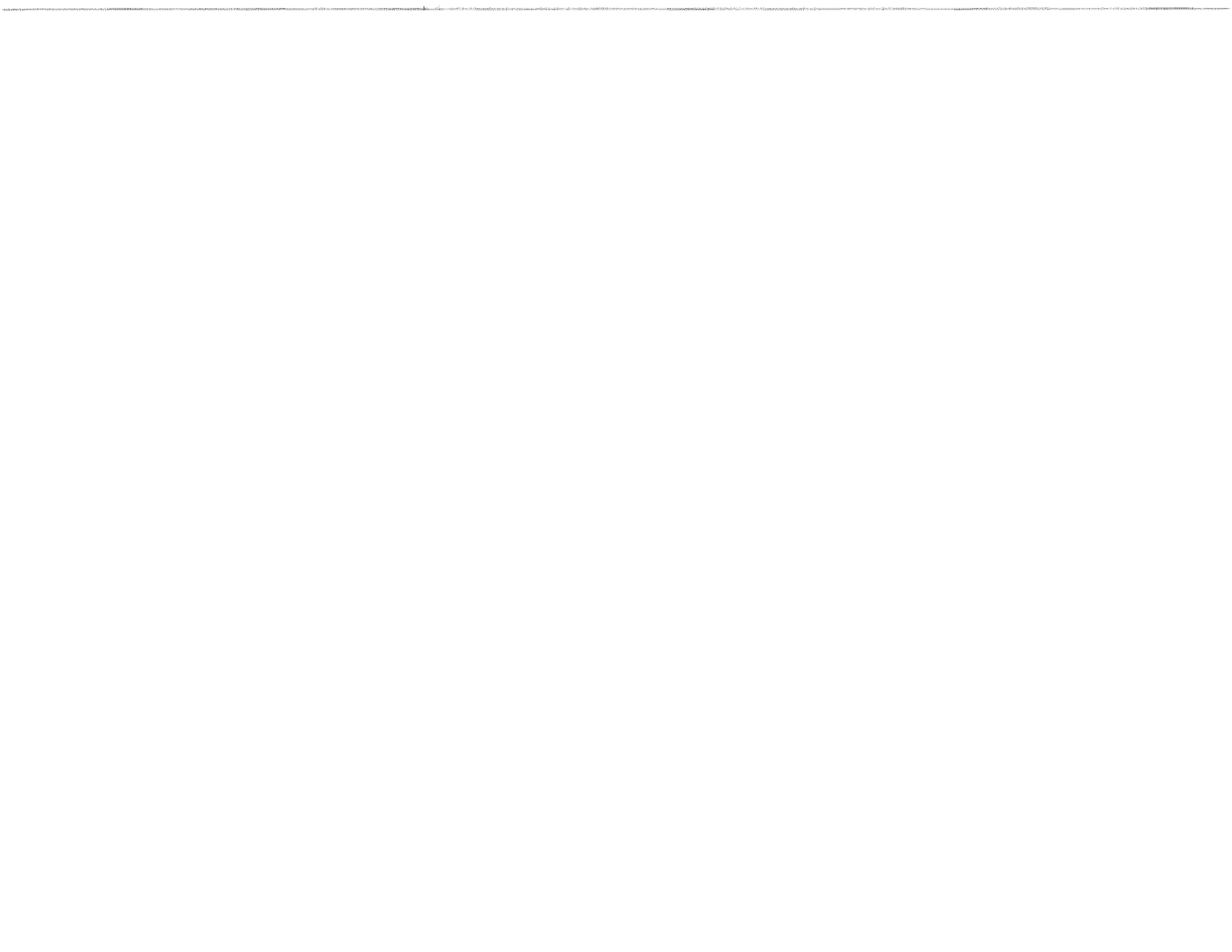


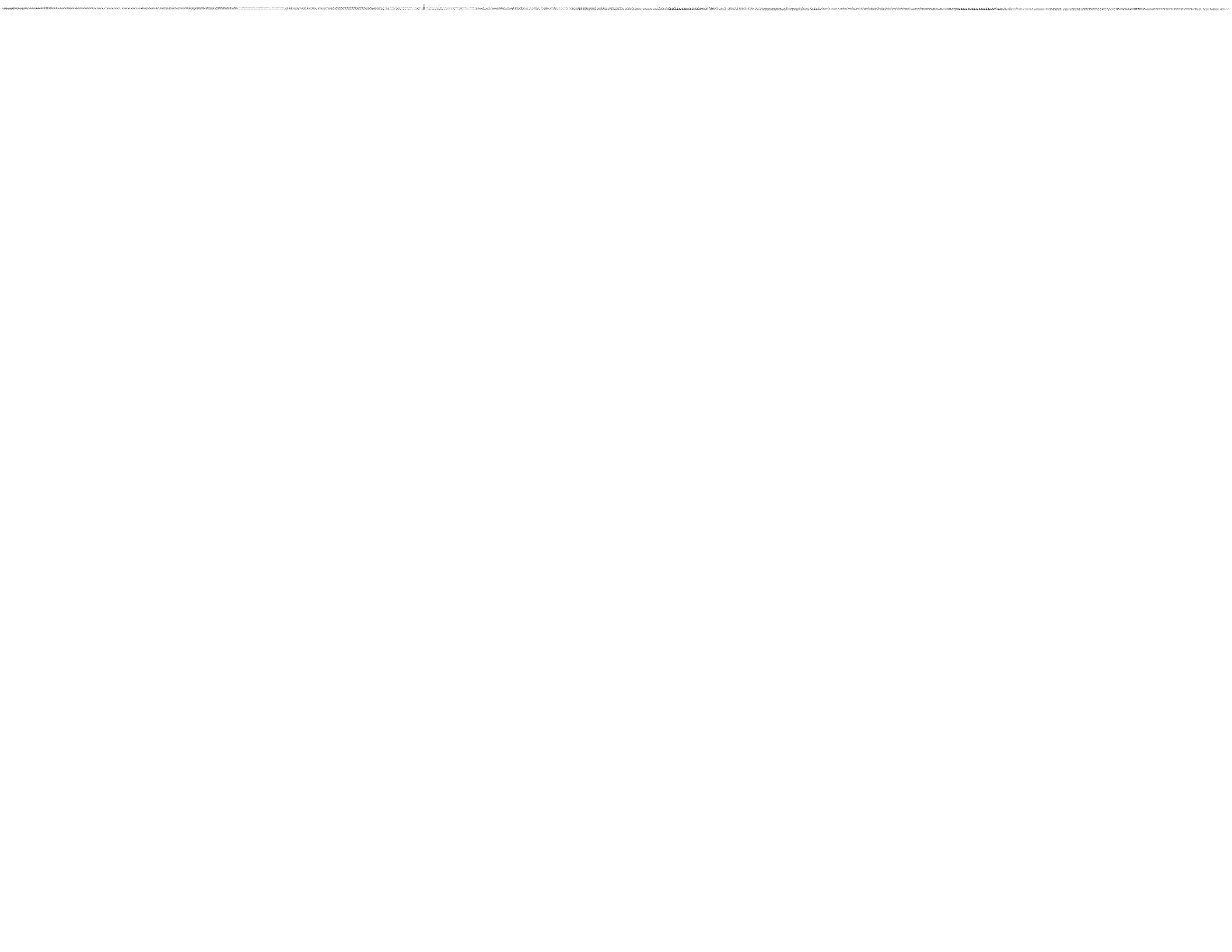














## AF Performance Goals

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Print Date: April 30, 2019

Selected Parameters:

Office: Both

Start Date: 10/01/2018

End Date: 03/31/2019

\*Exception: YES



# AF Performance Goals

(Confidential and Sensitive)

RAD

(b) (7)(E)

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date
<b>Processed</b>					
2018	30G	UNAUTH	N	12/06/2018	03/19/2019
2018	30G	AUTH	N	12/06/2018	02/04/2019
2018	M11	P_UNAUTH	N	11/20/2018	02/04/2019
2018	12G	UNAUTH_Q	Y	10/25/2018	03/12/2019
2018	12G	AUTH	Y	10/25/2018	12/10/2018
2018	12G	UNAUTH_M	Y	10/25/2018	12/10/2018
2018	M10	P_UNAUTH	Y	10/20/2018	12/04/2018
2018	Q3	H_S_P_UNAUTH	N	10/15/2018	11/27/2018
2018	Q3	H_S_P_UNAUTH	Y	10/15/2018	11/26/2018
2018	M9	P_UNAUTH	N	09/20/2018	10/29/2018
2018	12P	AUTH	Y	08/30/2018	10/22/2018
2018	12P	AUTH	Y	08/23/2018	10/22/2018
2018	12P	AUTH	Y	08/16/2018	10/15/2018
2018	12P	AUTH	Y	08/02/2018	10/01/2018

Total AF Reports Processed 14  
 Average Processing Days 62.21  
 Percentage to Goal 78.57%

(b) (7)(E)

**Processed - No committees**

Year	Type	Description	Election Sensitive	Due Date	Action Date
2018	30GR	AUTH	N	01/07/2019	02/11/2019
2018	30SGR	AUTH	N	12/27/2018	02/11/2019
2018	30GR	AUTH	N	12/20/2018	02/11/2019
2018	M12	P_UNAUTH	N	12/20/2018	02/11/2019
2018	30SG	AUTH	N	12/06/2018	02/04/2019
2018	12GR	AUTH	Y	11/26/2018	02/04/2019
2018	12SGR	AUTH	Y	11/15/2018	12/17/2018
2018	12GR	AUTH	Y	11/08/2018	12/11/2018
2018	12SG	AUTH	Y	10/25/2018	12/04/2018

(b) (7)(E)



# AF Performance Goals

(Confidential and Sensitive)

## Processed - No committees

					Action Date	
2018	M10	P_UNAUTH	N	10/20/2018	11/29/2018	(b) (7)(E)
2018	30SG	AUTH	N	09/06/2018	10/22/2018	
2018	12P	AUTH	Y	08/31/2018	10/22/2018	
2018	12P	AUTH	Y	08/25/2018	10/22/2018	
2018	M8	P_UNAUTH	N	08/20/2018	10/15/2018	
2018	12PR	AUTH	Y	08/16/2018	10/15/2018	
2018	12P	AUTH	Y	08/13/2018	10/09/2018	
2018	12P	AUTH	Y	08/09/2018	10/09/2018	
2018	12PR	AUTH	Y	08/02/2018	10/01/2018	
2019	12GR	AUTH	Y	12/27/2018	02/25/2019	

Total AF Reports Processed-No Committees	19
Average Processing Days	51.16
(b) (7)(E)	
Percentage to Goal	89.47%

Total AF Reports	33
Average Processing Days	55.85
(b) (7)(E)	
Percentage to Goal	84.85%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters  
 RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters  
 processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H  
 sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.





# AF Performance Goals

(Confidential and Sensitive)

## OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2018	Q1	3397	C00368415	08/08/2018	10/02/2018	55	Y
2018	Q2	3455	C00381517	11/01/2018	12/21/2018	50	Y
2018	Q2	3460	C00638825	10/25/2018	11/06/2018	12	Y
2018	Q2	3463	C00634873	10/29/2018	11/08/2018	10	Y
2018	Q2	3471	C00637728	10/30/2018	12/19/2018	50	Y
2018	12P	3487	C00660126	11/13/2018	02/05/2019	84	N
2018	M9	3489	C00147231	12/18/2018	02/14/2019	58	Y
2018	Q3	3496	C00679068	02/01/2019	03/27/2019	54	Y
2018	Q3	3501	C00131706	01/28/2019	03/29/2019	60	Y
2018	Q3	3519	C00668137	02/05/2019	03/12/2019	35	Y
2018	Q3	3526	C00641035	01/28/2019	03/22/2019	53	Y
2018	Q3	3528	C00661173	01/28/2019	03/15/2019	46	Y
2018	Q3	3533	C00634873	01/28/2019	03/13/2019	44	Y
2018	Q3	3544	C00614305	01/28/2019	03/13/2019	44	Y
2018	M10	3547	C00147231	01/31/2019	02/14/2019	14	Y
2018	12G	3552	C00147231	01/31/2019	02/14/2019	14	Y
2018	48H	3562	C00647081	01/28/2019	03/27/2019	58	Y



# AF Performance Goals

(Confidential and Sensitive)

Total Challenges Processed	17
Average Processing Days	43.59
Total Reports Processed within 60 Days	16
Percentage to Goal	94.12%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

Administrative Fine Program  
Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19 (3/31/19)
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$128,464	\$60,721

(b) (7)(E)



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2019 JUL 31 PM 12:13

**SENSITIVE**

July 31, 2019

AGENDA DOCUMENT NO. **X19-31**  
AGENDA ITEM  
For meeting of **August 20, 2019**

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista Roche *KR*  
Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Dayna C. Brown *DB*  
Acting Assistant Staff Director  
Audit Division

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2019 – 3<sup>rd</sup> Quarter Highlights (4/1/19 – 6/30/19) & FY Statistical Overview

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**Administrative Fine Program (Office of Administrative Review)**

During the third quarter of FY 2019, the Commission processed 75 Reason to Believe (RTB) findings. OAR received 17 challenges and processed 15 Reviewing Officer Recommendations (ROR). The Commission reviewed final determination recommendations in

58 cases, made a final determination that the respondents in 54 cases violated 52 U.S.C. § 30104(a), and assessed \$142,519 in civil penalties. The Commission also collected \$147,873 in fine payments and prepared 53 cases for public release.

**(b) (7)(A)**


(b) (7)(A) Additionally, OAR forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).












# Status of Compliance

FY 2019  
(10/1/2018 - 6/30/2019)



Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public’s access to information about how campaign funds are raised and spent

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19 (6/30/19)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%	<b>94%</b>
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	99.0%	<b>99.9%</b>
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	<b>100%</b>

## Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

## Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2019 Performance Goals	Status 6/30/19
<p>RAD staff collaborated with OCIO and the Information Division on the development of Party Committee and Multistate IE reporting examples.</p>	<p>The Party Committee and Multistate IE reporting examples were posted on the website in May and June 2019.</p>
<p>A redacted version of the 2019-2020 RAD Review &amp; Referral Procedures was approved by the Commission.</p>	<p>The redacted version of the 2019-2020 RAD Review &amp; Referral Procedures was posted on the website on July 16, 2019.</p>
<p>RAD staff collaborated with the Information Division on a series of reporting webinars for Trade Association PACs, Party Committees, and Candidate Committees, as well as a FECfile webinar.</p>	<p>The webinars were held in April, May and June 2019.</p>

**Strategic Objective 2: Promote Compliance with the FECA and Related Statutes**

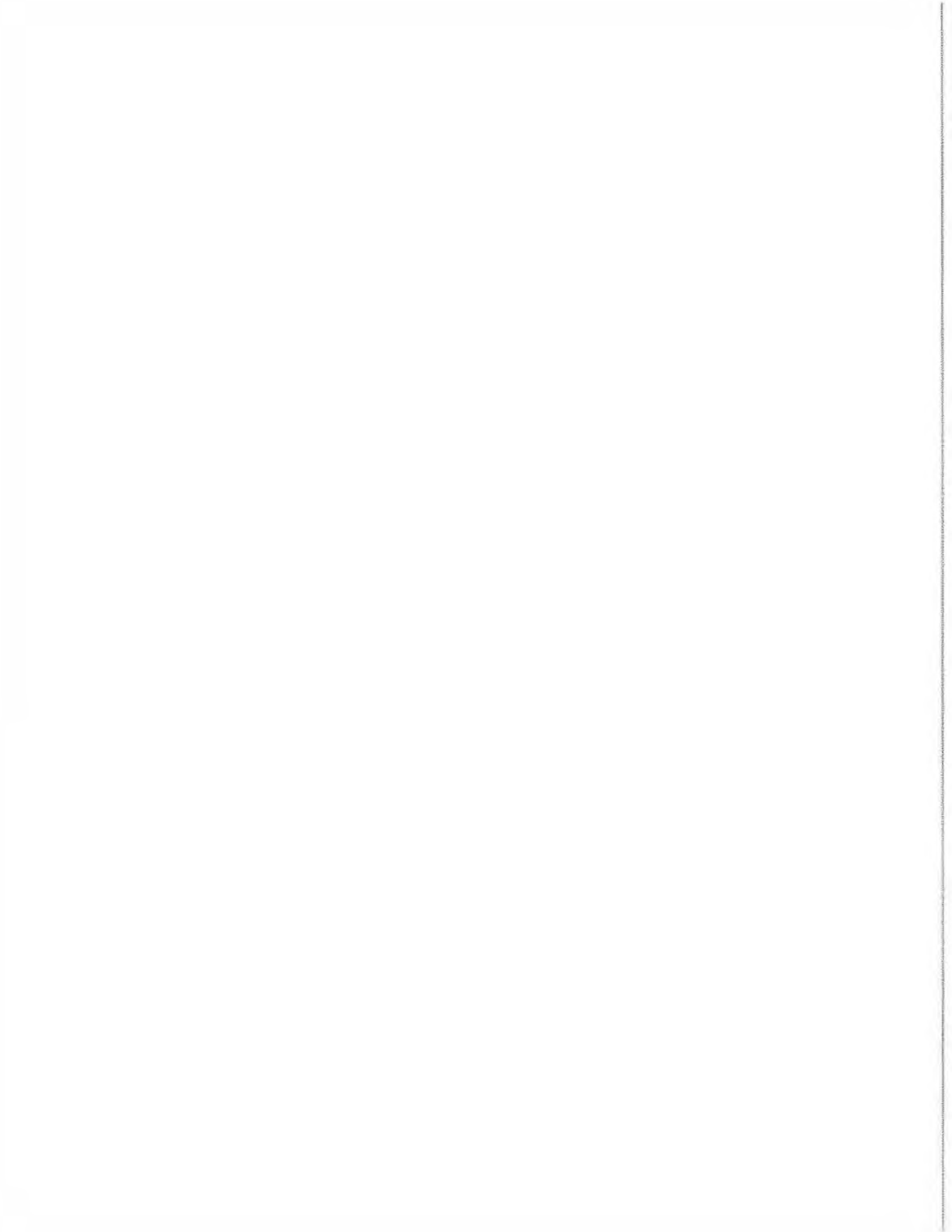
**Performance Goal 2: Seek adherence to FECA requirements through fair, effective and timely enforcement and compliance programs**

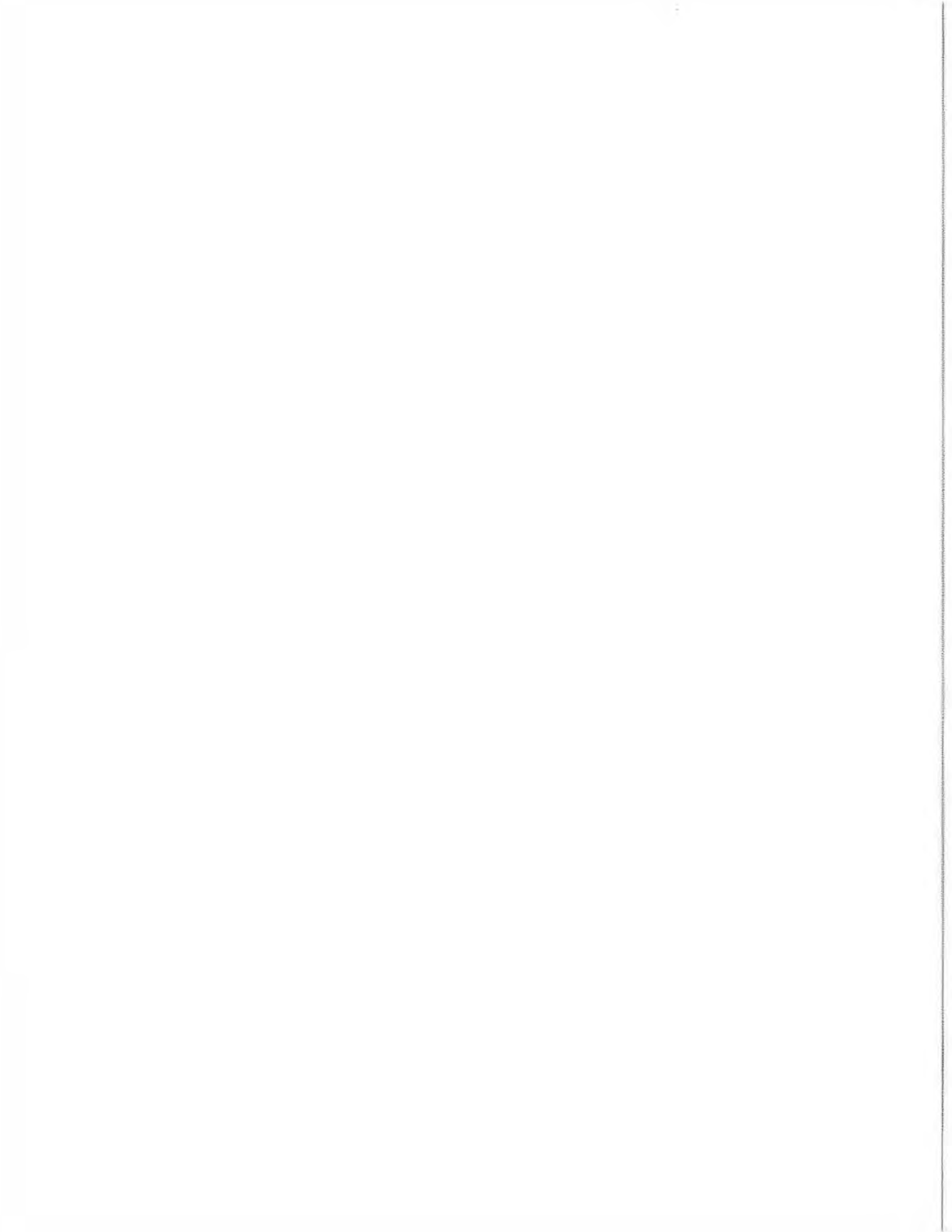
Performance Goals	FY 14	FY 15	FY 16	FY 17	FY 18	FY 19 (6/30/19)
RAD to review 75% of reports within 90 days of receipt	85.4%	79.3%	92.9%	76.6%	92.2%	75%
RAD to send 75% of RFAs within 40 days of report review	84%	92%	92%	88%	88%	85%
(b) (7)(E)	96.8%	93.5%	100%	96.2%	96.9%	86.36%
(b) (7)(E)	93%	43%	56%	25%	45%	100%
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	100%	97%	81.8%	96.67%	100%	96.9%
(b) (7)(E)	95%	100%	100%	100%	99%	85%

Strategic Objective 4: Foster a Culture of High Performance

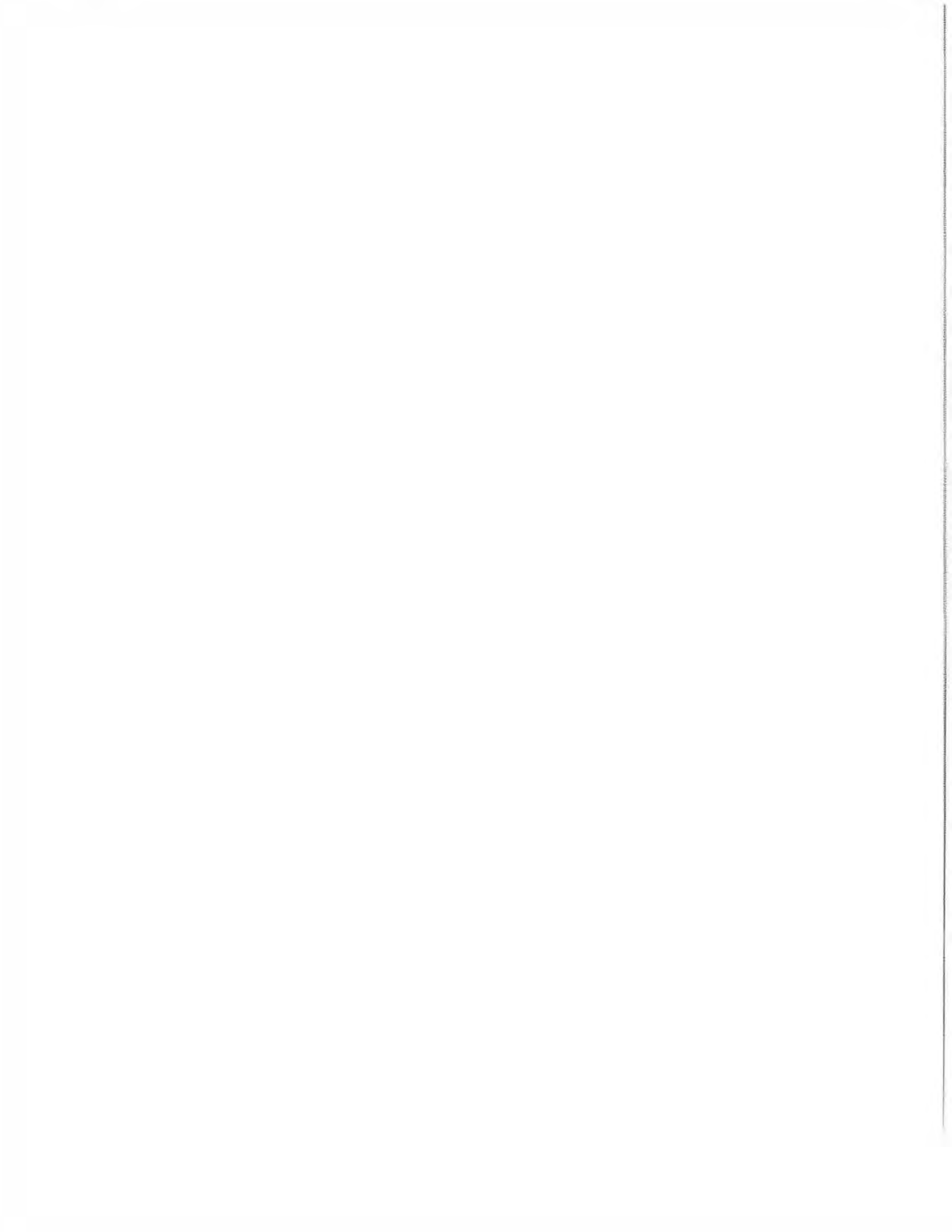
Performance Goal 1: Foster a workplace that delivers results

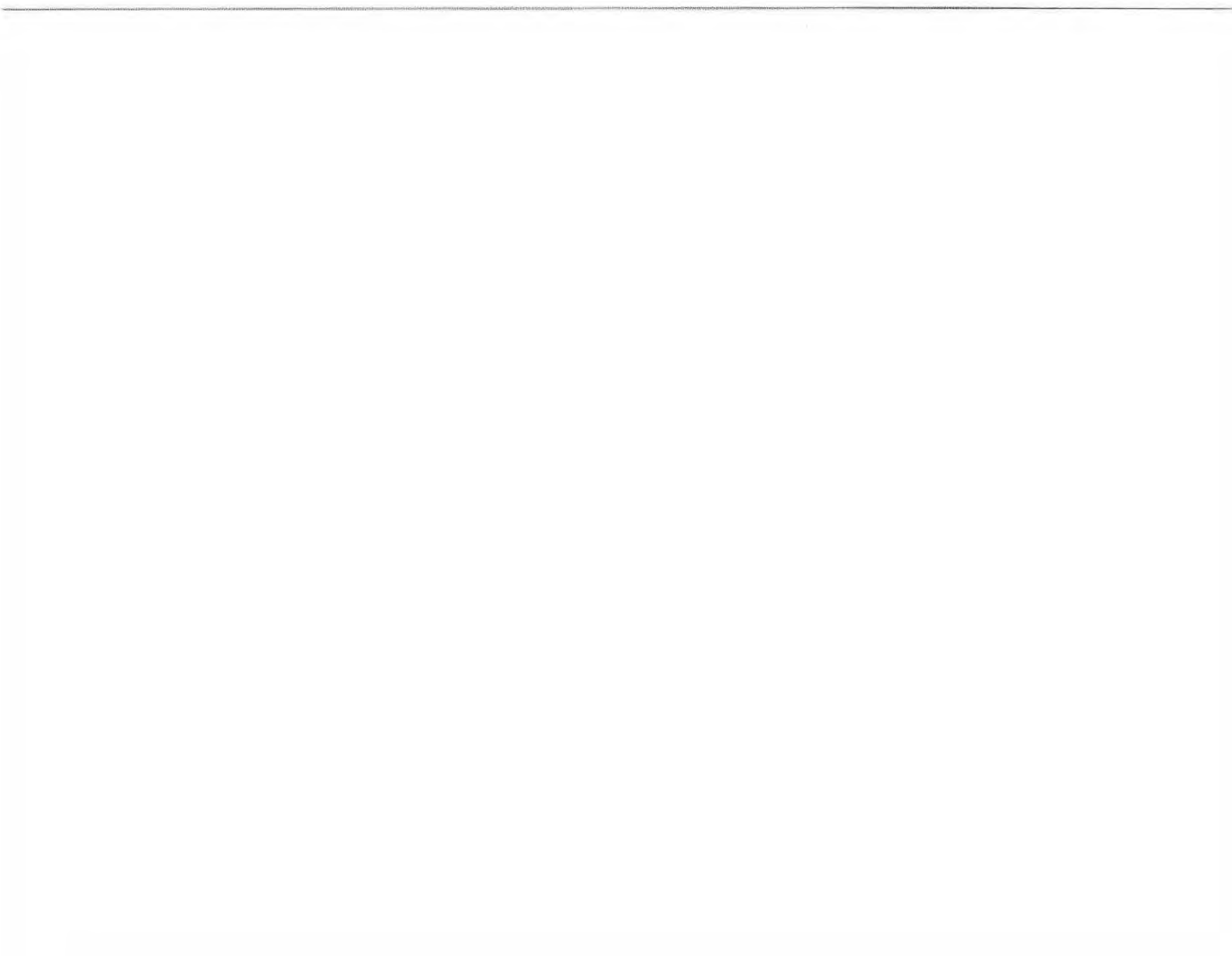
Office	Deliverable	FY 14	FY 15	FY 16	FY 17	FY 18	FY 19 (6/30/19)
RAD	Documents/ Transactions Coded	N/A	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	9,125/ 30,869,828	4,287/ 17,734,302
	Documents/Pages Processed in Paper Automation System	N/A	N/A	N/A	8,139/ 684,747	8,822/ 902,572	4,079/ 39,235
	Documents/Pages Reviewed	68,282/ 9,211,502	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	71,807/ 29,794,245
	Letters sent	10,220	13,433	13,253	14,796	13,763	9,737
	Telephone calls handled	10,673	11,822	12,362	11,634	13,036	9,684
	Email inquiries handled	N/A	N/A	N/A	N/A	396	477
	Referrals	59	91	43	95	46	34
	AF Cases RTB/FD	70/55	191/159	83/33	163/168	95/23	254/51
Audit	<b>(b) (7)(E)</b>						
ADRO							
OAR	Cases Received	6	35	12	29	8	29
	Cases Closed (FD)	5	32	11	32	10	22

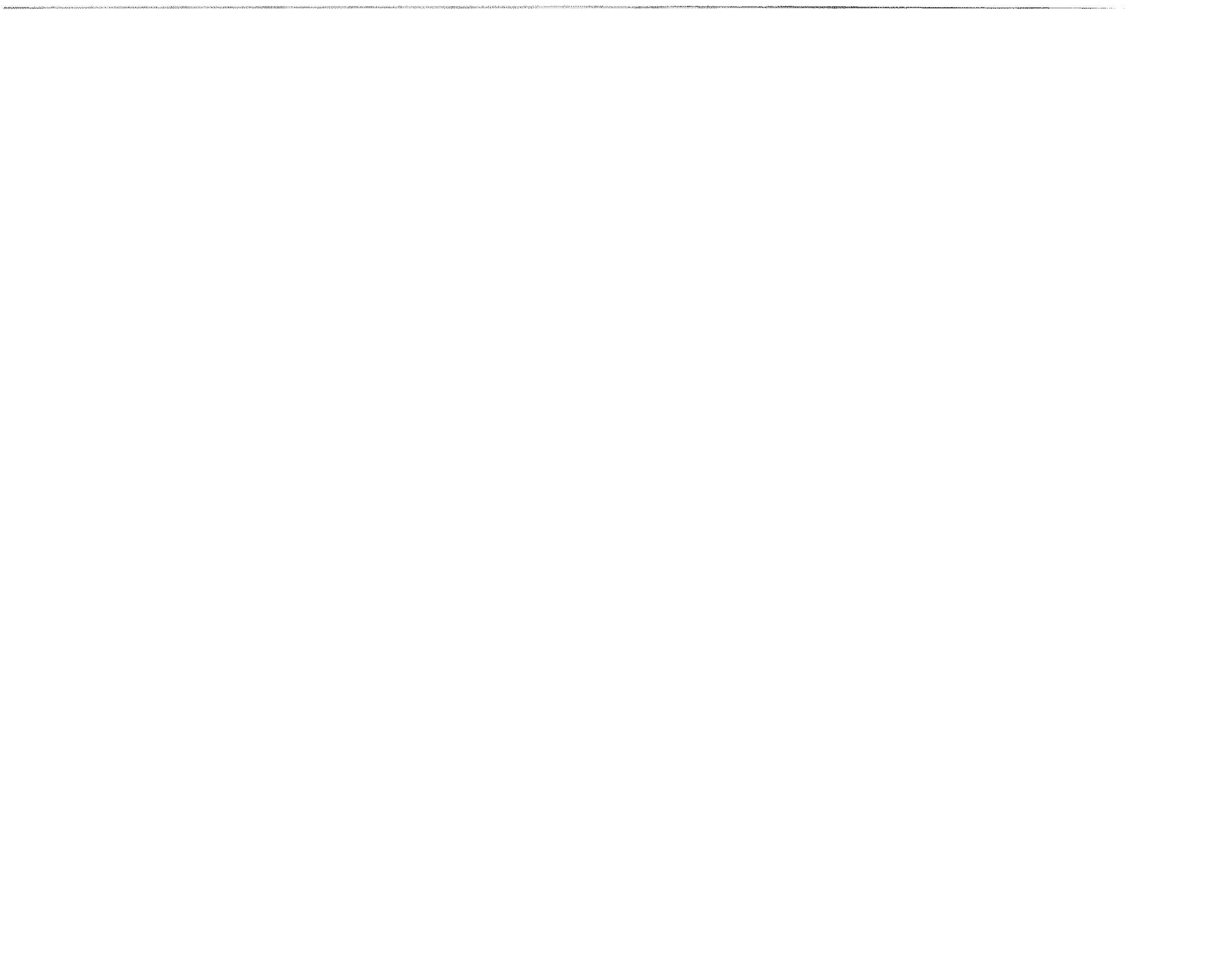


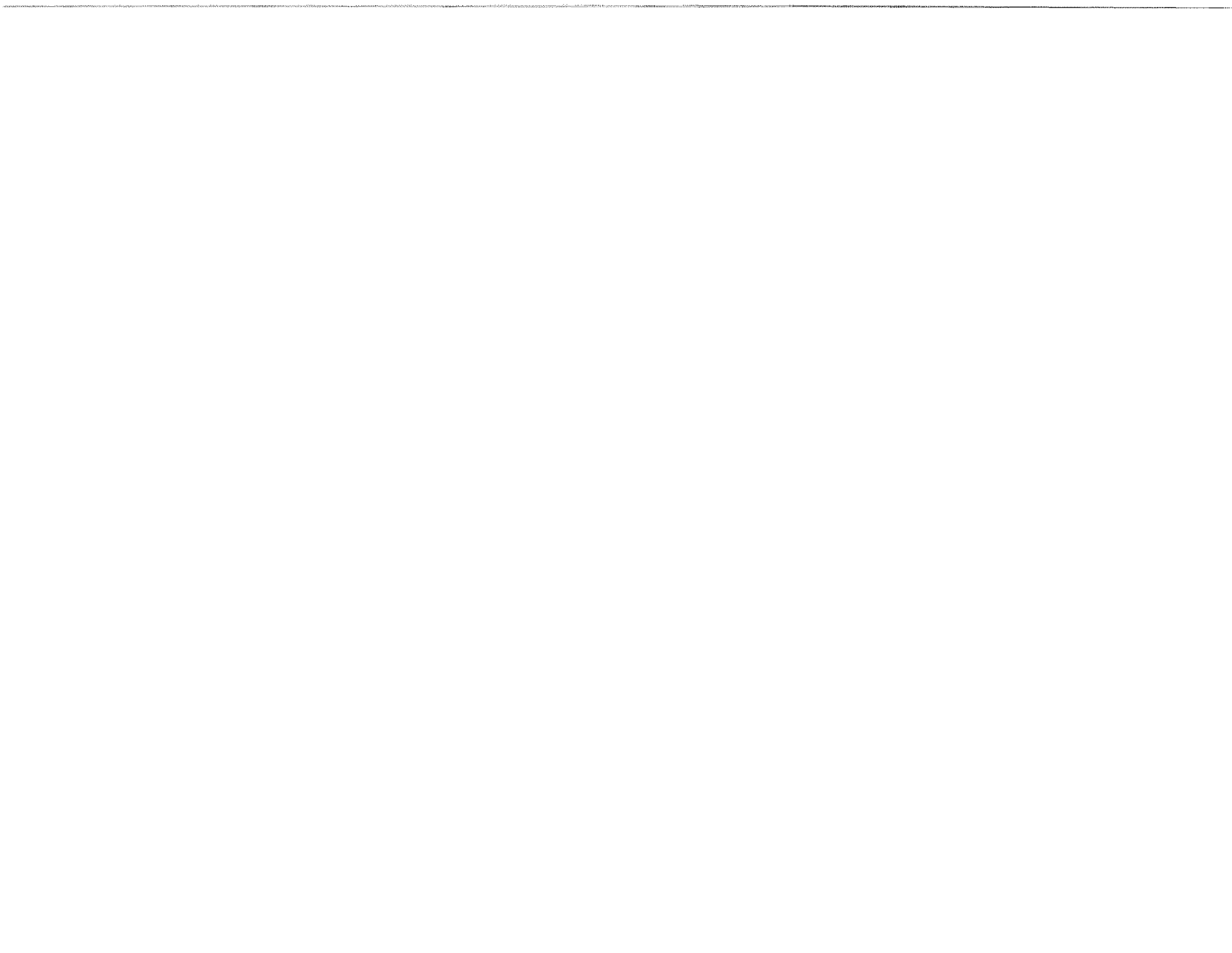


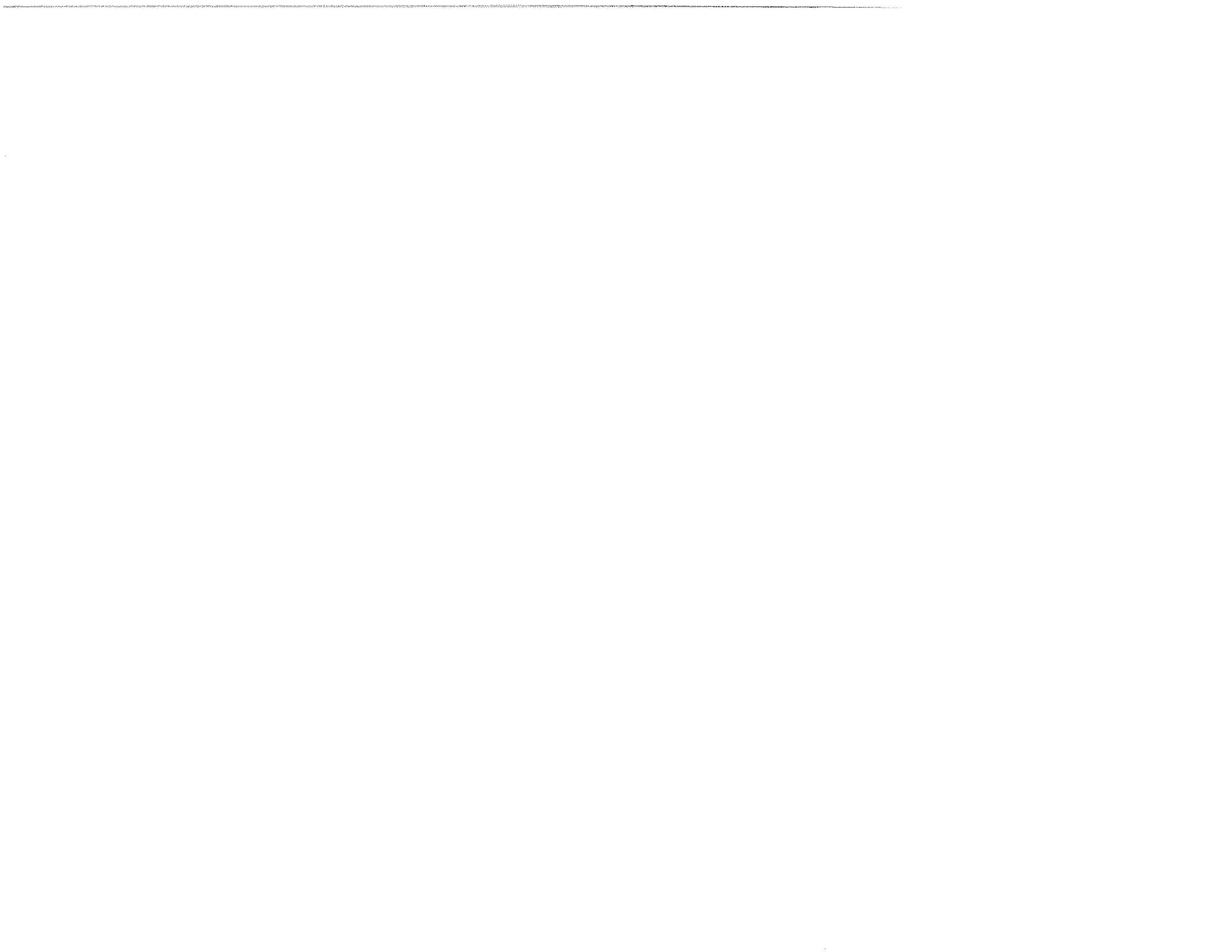


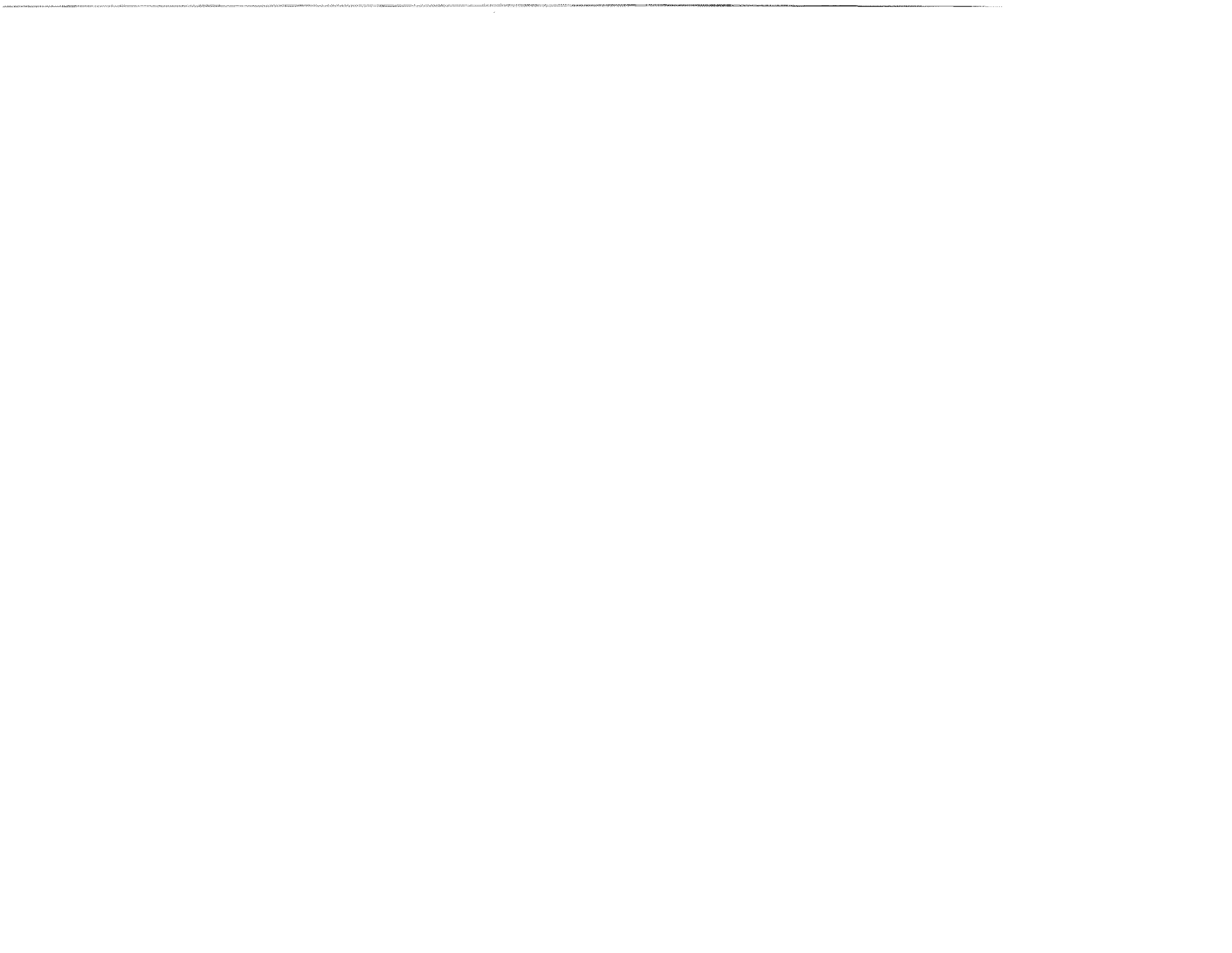


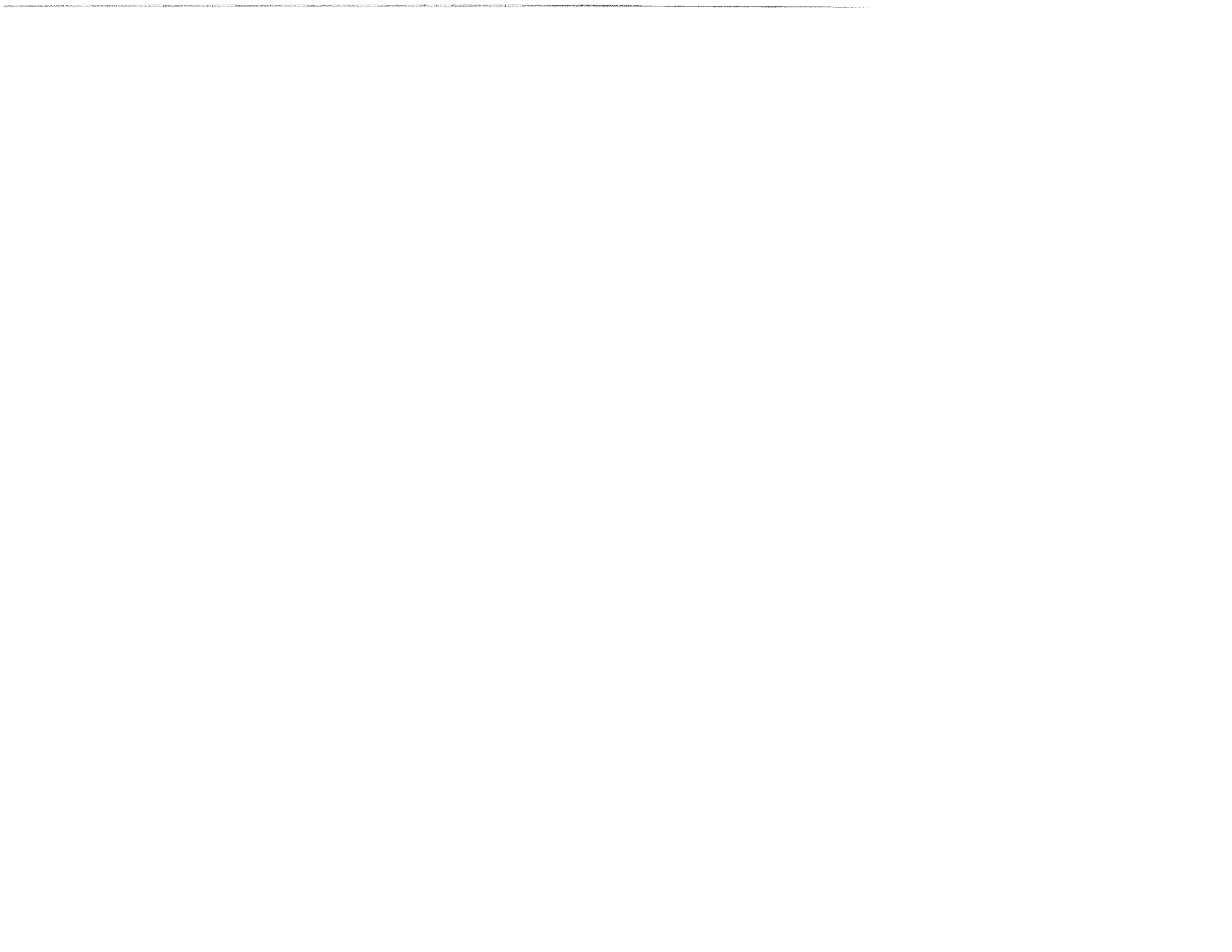


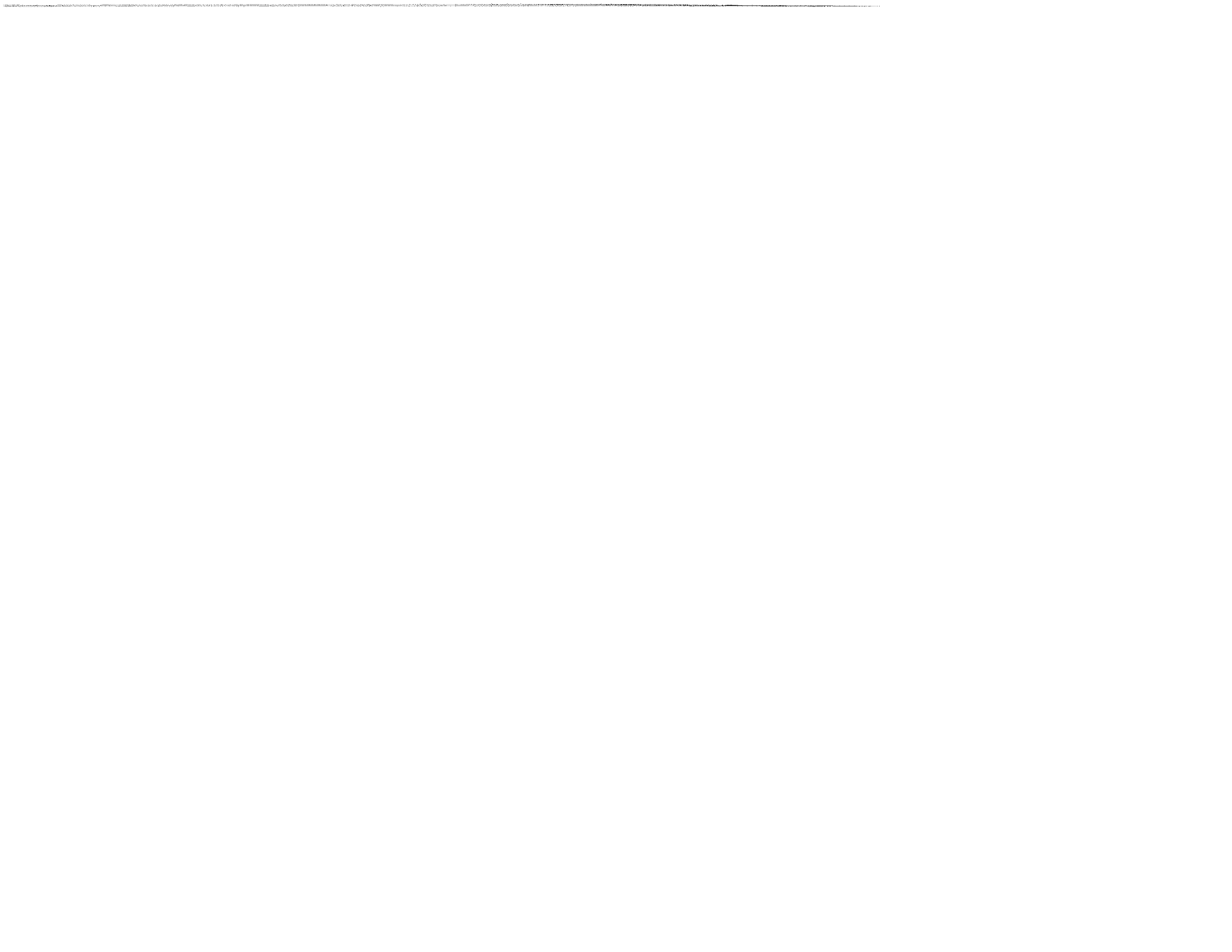




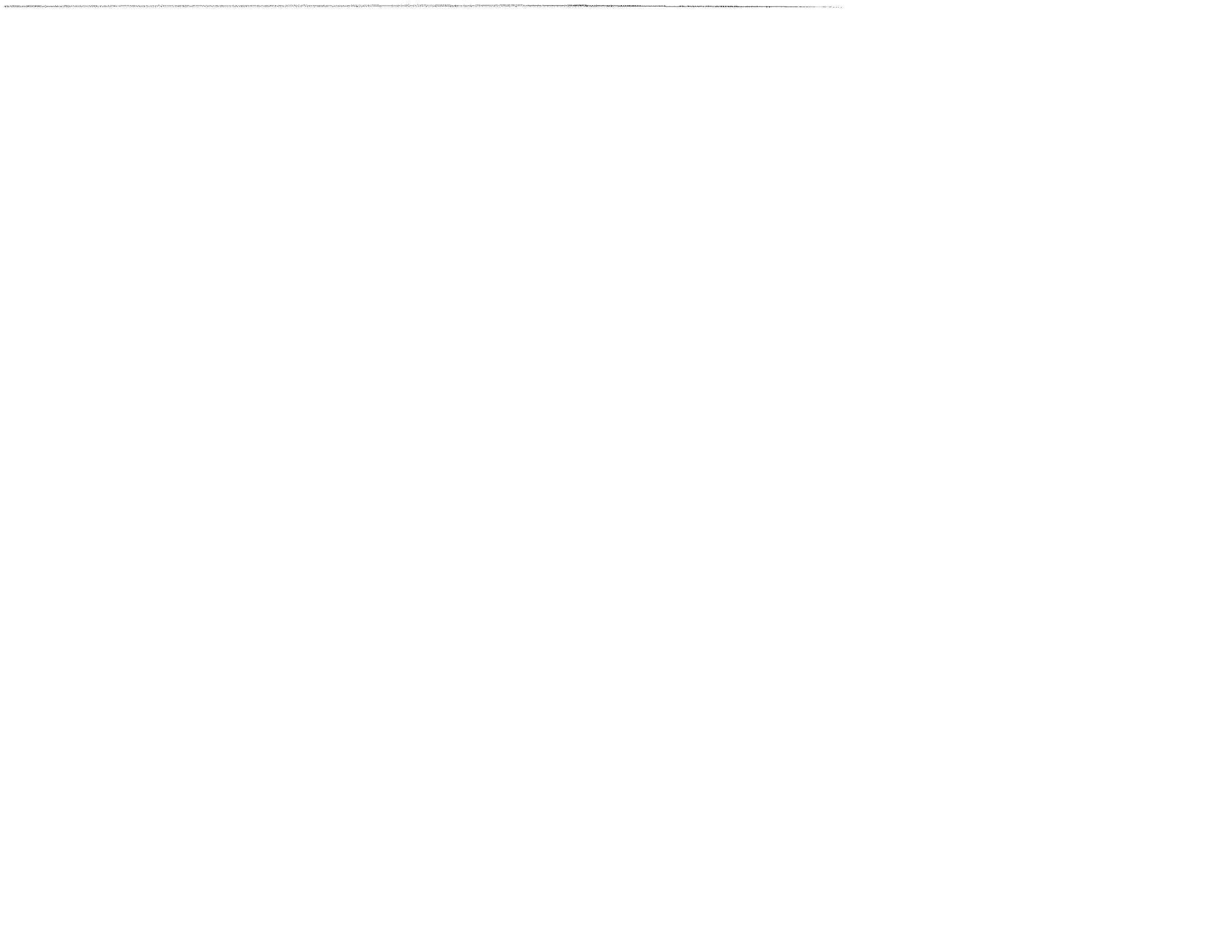














## AF Performance Goals

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Print Date: July 31, 2019

Selected Parameters:

Office: Both

Start Date: 10/01/2018

End Date: 06/30/2019

\*Exception: YES



# AF Performance Goals

(Confidential and Sensitive)

## RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
<b>Processed</b>						
2018	YE	H_S_P_UNAUTH	N	01/31/2019	04/01/2019	
2018	30G	UNAUTH	N	12/06/2018	03/19/2019	
2018	30G	AUTH	N	12/06/2018	02/04/2019	
2018	M11	P_UNAUTH	N	11/20/2018	02/04/2019	
2018	12G	UNAUTH_Q	Y	10/25/2018	03/12/2019	
2018	12G	AUTH	Y	10/25/2018	12/10/2018	
2018	12G	UNAUTH_M	Y	10/25/2018	12/10/2018	
2018	M10	P_UNAUTH	Y	10/20/2018	12/04/2018	
2018	Q3	H_S_P_UNAUTH	N	10/15/2018	11/27/2018	
2018	Q3	H_S_P_UNAUTH	Y	10/15/2018	11/26/2018	
2018	M9	P_UNAUTH	N	09/20/2018	10/29/2018	
2018	12P	AUTH	Y	08/30/2018	10/22/2018	
2018	12P	AUTH	Y	08/23/2018	10/22/2018	
2018	12P	AUTH	Y	08/16/2018	10/15/2018	
2018	12P	AUTH	Y	08/02/2018	10/01/2018	
2018	YE	H_S_P_UNAUTH	N	01/31/2019	04/09/2019	
2019	Q1	H_S_P	N	04/15/2019	06/11/2019	
2019	M2	P_UNAUTH	N	02/20/2019	04/15/2019	

Total AF Reports Processed 18  
 Average Processing Days 61.67  
 Percentage to Goal 77.78%

(b) (7)(E)

### Processed - No committees

Year	Type	Description	Election Sensitive	Due Date	Action Date	(b) (7)(E)
2018	30GR	AUTH	N	01/07/2019	02/11/2019	
2018	30SGR	AUTH	N	12/27/2018	02/11/2019	
2018	30GR	AUTH	N	12/20/2018	02/11/2019	
2018	M12	P_UNAUTH	N	12/20/2018	02/11/2019	
2018	30SG	AUTH	N	12/06/2018	02/04/2019	



# AF Performance Goals

(Confidential and Sensitive)

## Processed - No committees

					Action Date	
2018	12GR	AUTH	Y	11/26/2018	02/04/2019	
2018	12SGR	AUTH	Y	11/15/2018	12/17/2018	
2018	12GR	AUTH	Y	11/08/2018	12/11/2018	
2018	12SG	AUTH	Y	10/25/2018	12/04/2018	
2018	M10	P_UNAUTH	N	10/20/2018	11/29/2018	
2018	30SG	AUTH	N	09/06/2018	10/22/2018	
2018	12P	AUTH	Y	08/31/2018	10/22/2018	
2018	12P	AUTH	Y	08/25/2018	10/22/2018	
2018	M8	P_UNAUTH	N	08/20/2018	10/15/2018	
2018	12PR	AUTH	Y	08/16/2018	10/15/2018	
2018	12P	AUTH	Y	08/13/2018	10/09/2018	
2018	12P	AUTH	Y	08/09/2018	10/09/2018	
2018	12PR	AUTH	Y	08/02/2018	10/01/2018	
2019	M5	P_UNAUTH	N	05/20/2019	06/26/2019	
2019	12SG	AUTH	Y	05/09/2019	06/26/2019	
2019	12SP	AUTH	Y	05/02/2019	06/26/2019	
2019	M4	P_UNAUTH	N	04/20/2019	06/17/2019	
2019	12SP	AUTH	Y	04/18/2019	06/17/2019	
2019	M3	P_UNAUTH	N	03/20/2019	04/22/2019	
2019	30GR	AUTH	N	02/07/2019	04/08/2019	
2019	12GR	AUTH	Y	12/27/2018	02/25/2019	

(b) (7)(E)

Total AF Reports Processed-No Committees	26
Average Processing Days	50.88
(b) (7)(E)	
Percentage to Goal	92.31%



# AF Performance Goals

(Confidential and Sensitive)

Total AF Reports	44
Average Processing Days	55.3

(b) (7)(E)

Percentage to Goal	86.36%
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RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters  
RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters  
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H  
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



# AF Performance Goals

(Confidential and Sensitive)

## OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2018	Q1	3397	C00368415	08/08/2018	10/02/2018	55	Y
2018	Q2	3455	C00381517	11/01/2018	12/21/2018	50	Y
2018	Q2	3460	C00638825	10/25/2018	11/06/2018	12	Y
2018	Q2	3463	C00634873	10/29/2018	11/08/2018	10	Y
2018	Q2	3471	C00637728	10/30/2018	12/19/2018	50	Y
2018	12P	3487	C00660126	11/13/2018	02/05/2019	84	N
2018	M9	3489	C00147231	12/18/2018	02/14/2019	58	Y
2018	Q3	3496	C00679068	02/01/2019	03/27/2019	54	Y
2018	Q3	3501	C00131706	01/28/2019	03/29/2019	60	Y
2018	Q3	3519	C00668137	02/05/2019	03/12/2019	35	Y
2018	Q3	3526	C00641035	01/28/2019	03/22/2019	53	Y
2018	Q3	3528	C00661173	01/28/2019	03/15/2019	46	Y
2018	Q3	3533	C00634873	01/28/2019	03/13/2019	44	Y
2018	Q3	3544	C00614305	01/28/2019	03/13/2019	44	Y
2018	M10	3547	C00147231	01/31/2019	02/14/2019	14	Y
2018	12G	3552	C00147231	01/31/2019	02/14/2019	14	Y
2018	48H	3562	C00647081	01/28/2019	03/27/2019	58	Y
2018	30G	3572	C00666131	03/19/2019	05/16/2019	58	Y
2018	48H	3574	C00653196	04/19/2019	05/14/2019	25	Y
2018	12G	3588	C00450866	03/19/2019	05/16/2019	58	Y
2018	12G	3598	C00272724	03/21/2019	04/17/2019	27	Y
2018	30G	3622	C00492579	05/03/2019	06/05/2019	33	Y
2018	30G	3624	C00658757	04/29/2019	05/23/2019	24	Y
2018	30G	3636	C00650432	05/15/2019	06/21/2019	37	Y



# AF Performance Goals

(Confidential and Sensitive)

2018	30G	3644	C00157941	04/30/2019	06/12/2019	43	Y
2018	30G	3645	C00131706	04/30/2019	05/20/2019	20	Y
2018	30G	3655	C00522458	04/30/2019	06/13/2019	44	Y
2018	YE	3664	C00324780	04/15/2019	06/12/2019	58	Y
2018	YE	3665	C00658757	04/29/2019	05/23/2019	24	Y
2018	YE	3667	C00216184	04/29/2019	06/12/2019	44	Y
2018	YE	3677	C00516922	05/06/2019	06/18/2019	43	Y
2018	YE	3707	C00661181	05/06/2019	06/14/2019	39	Y

Total Challenges Processed 32

Average Processing Days 41.19

Total Reports Processed within 60 Days 31

Percentage to Goal 96.88%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION COMMISSION  
SECRETARIAT

2019 OCT 31 PM 12:07

AGENDA DOCUMENT NO. X19-36  
AGENDA ITEM  
For meeting of 11-19-19

MEMORANDUM

**SENSITIVE**

October 31, 2019

TO: The Commission

THROUGH: Alec Palmer *AP by KRF*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista Roche *KR*  
Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Dayna C. Brown *DCB*  
Acting Assistant Staff Director  
Audit Division

Debbie Chacona *DC for DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2019 – 4<sup>th</sup> Quarter Highlights (7/1/19 – 9/30/19) & FY Statistical Overview

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### **Administrative Fine Program (Office of Administrative Review)**

During the fourth quarter of FY 2019, the Commission processed 8 Reason to Believe (RTB) findings. OAR received 1 challenge and processed 5 Reviewing Officer Recommendations (ROR). The Commission reviewed final determination recommendations in 56 cases, made a final determination that the respondents in 51 cases violated 52 U.S.C. § 30104(a), and assessed \$143,447 in civil penalties. The Commission also collected \$32,622 in fine payments and prepared 54 cases for public release.

## (b) (7)(E)


(b) (7)(E) Additionally, OAR forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

In the fourth quarter, the Reviewing Officer also collaborated with ADRO, OGC, OCFO, and OCIO to design new financial reports for ADRO and OGC civil penalties. The reports meet OCFO and Treasury Report on Receivables requirements and will greatly streamline the monthly financial reporting process. The Reviewing Officer will train ADRO and OGC staff on the new reporting process in the first quarter of FY 2020 and continue to provide assistance as necessary.









# Status of Compliance

FY 2019  
(10/1/2018 - 9/30/2019)



**Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data**

**Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent**

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19 (9/30/19)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%	<b>94.1%</b>
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	99.0%	<b>99.9%</b>
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	<b>100%</b>

## Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

## Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2019 Performance Goals	Status 9/30/19
RAD staff collaborated with OCIO on the development and user acceptance testing of FEC Form 3X for the NextGen Efiling System.	Form 3X is expected to be completed by the end of the year.
RAD staff collaborated with the Information Division on reporting & FECfile webinars for PACs and Party Committees, and the FEC regional conference for all committee types in Chicago.	The webinars were held in July 2019 and the regional conference was held in August 2019.



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

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

Performance Goals	FY 14	FY 15	FY 16	FY 17	FY 18	FY 19 (9/30/19)
RAD to review 75% of reports within 90 days of receipt	85.4%	79.3%	92.9%	76.6%	92.2%	76%
RAD to send 75% of RFAs within 40 days of report review	84%	92%	92%	88%	88%	85%
(b) (7)(E)	96.8%	93.5%	100%	96.2%	96.9%	88%
(b) (7)(E)	93%	43%	56%	25%	45%	100%
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	100%	97%	81.8%	96.67%	100%	97%
(b) (7)(E)	95%	100%	100%	100%	99%	100%

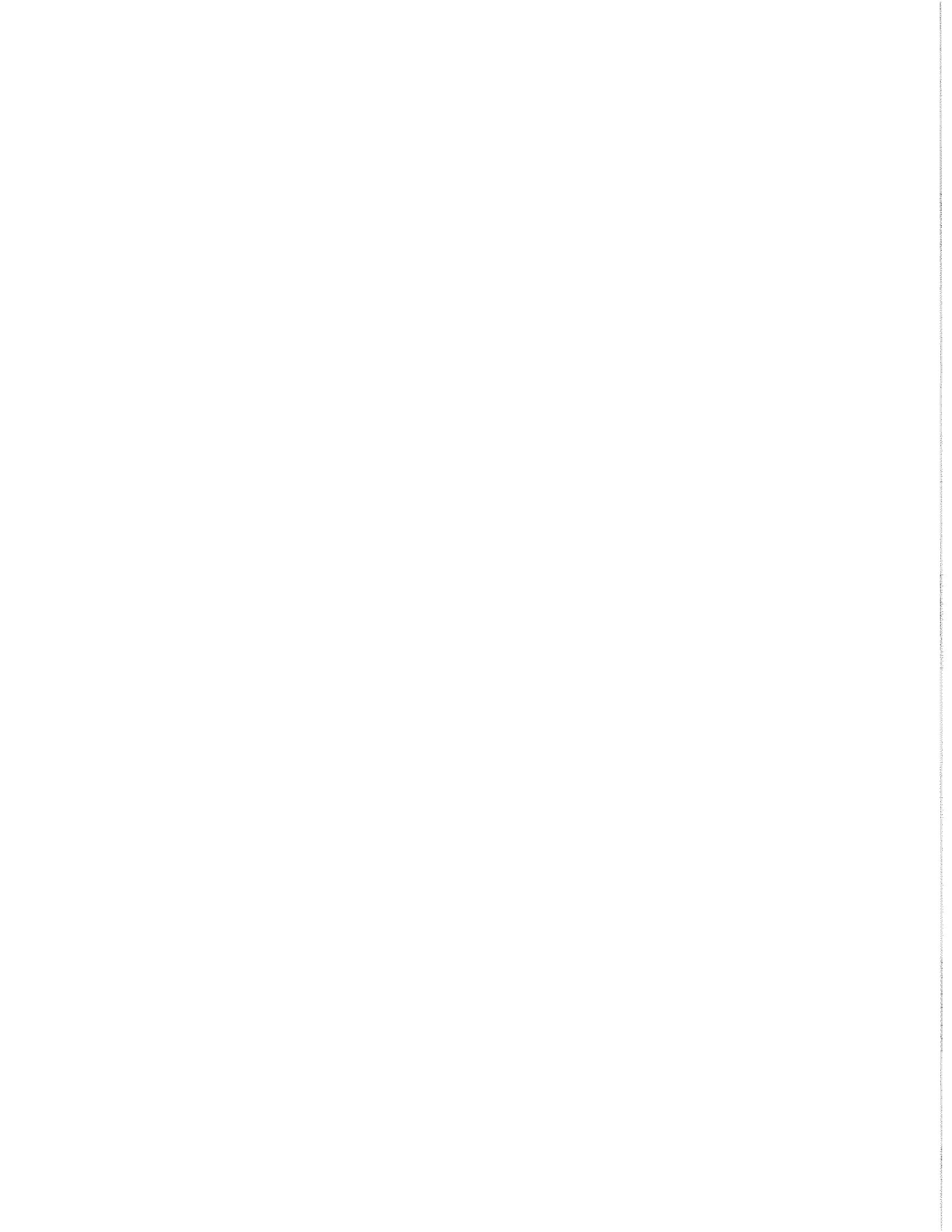
Strategic Objective 4: Foster a Culture of High Performance

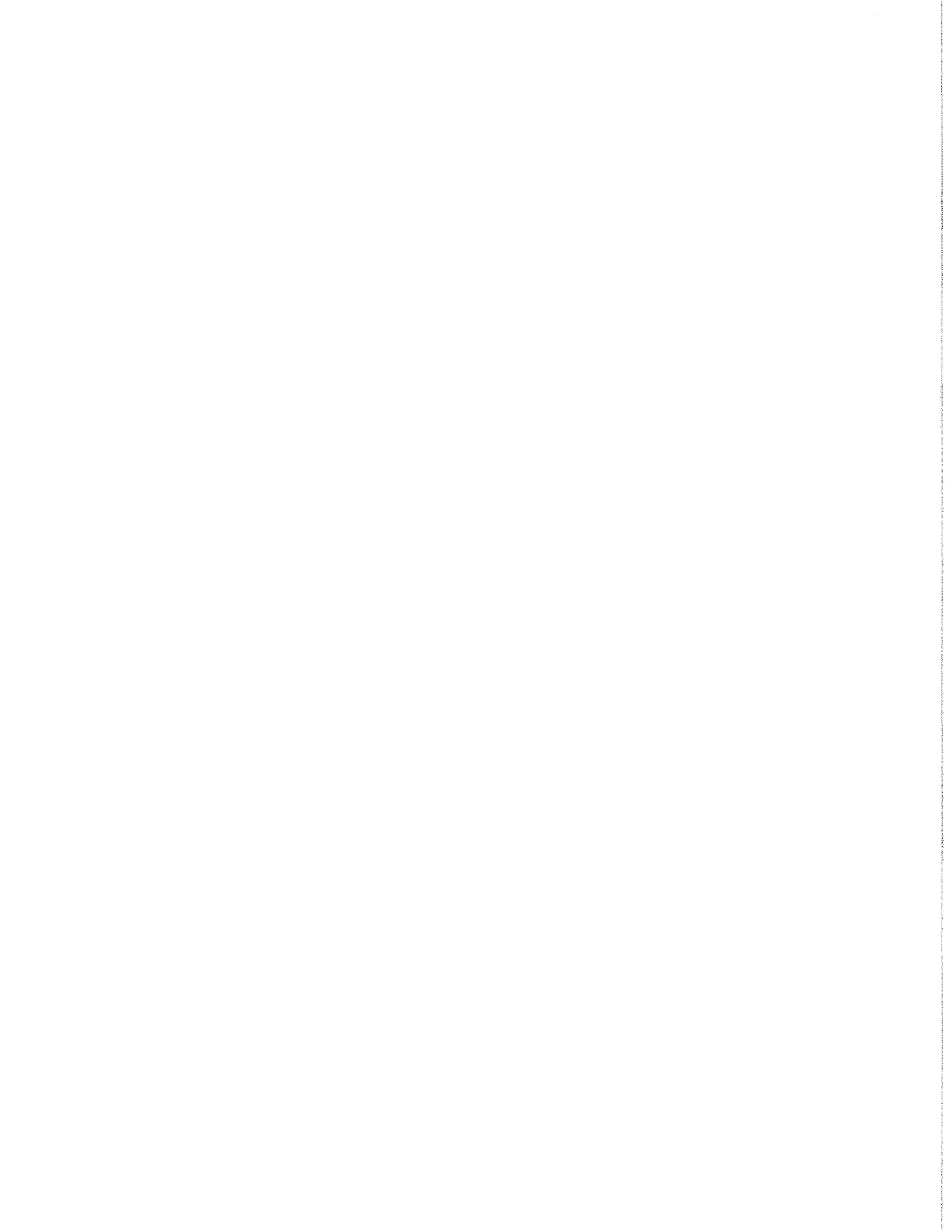
Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 14	FY 15	FY 16	FY 17	FY 18	FY 19 (9/30/19)
RAD	Documents/ Transactions Coded	N/A	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828
	Documents/Pages Processed in Paper Automation/ Conversion System	N/A	N/A	N/A	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417
	Documents/Pages Reviewed	68,282/ 9,211,502	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699
	Letters sent	10,220	13,433	13,253	14,796	13,763	12,562
	Telephone calls handled	10,673	11,822	12,362	11,634	13,036	13,149
	Email inquiries handled	N/A	N/A	N/A	N/A	396	658
	Referrals	59	91	43	95	46	82
	AF Cases RTB/FD	70/55	191/159	83/33	163/168	95/23	262/93
Audit	<b>(b) (7)(E)</b>						
ADRO							
OAR	Cases Received	6	35	12	29	8	37
	Cases Closed (FD)	5	32	11	32	10	36

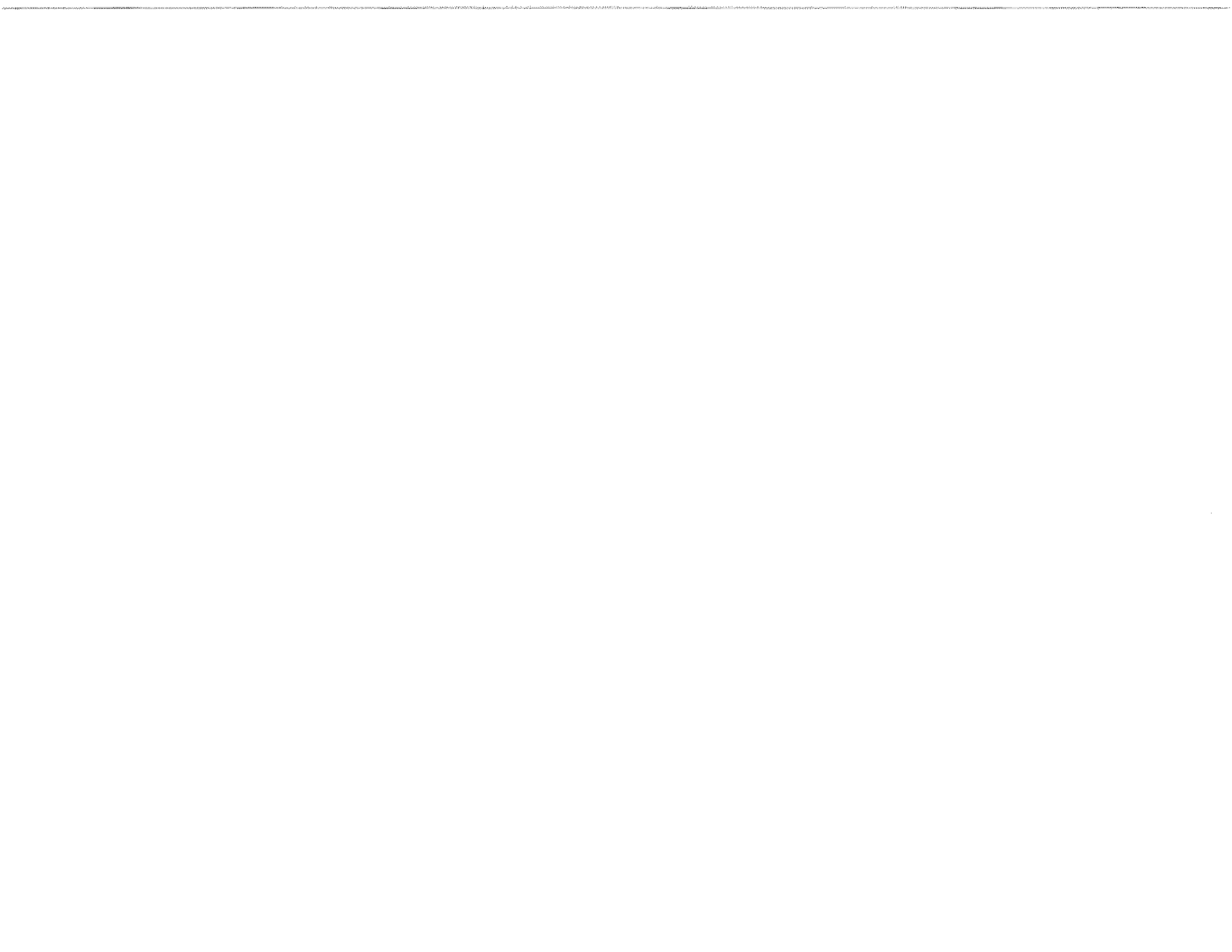




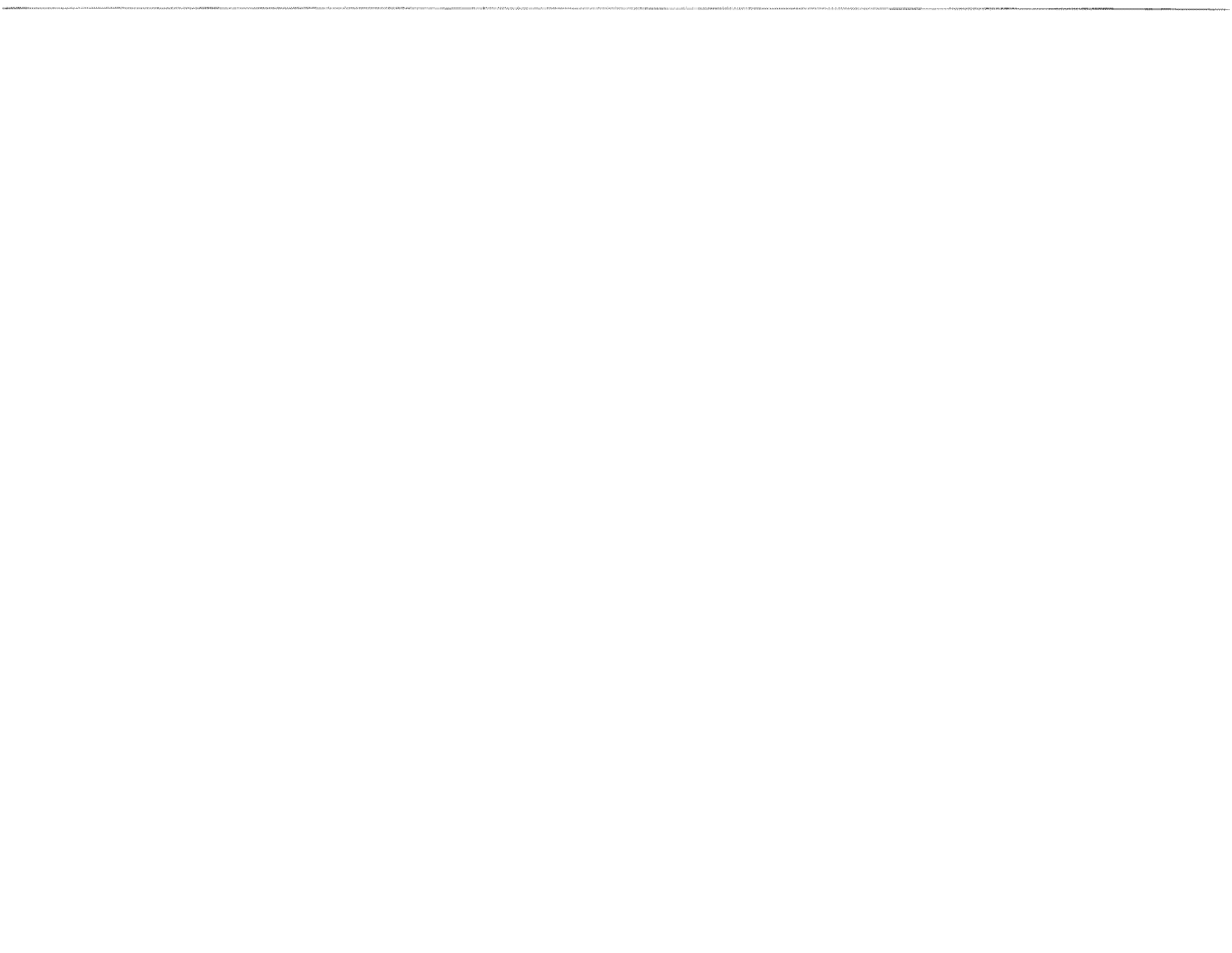


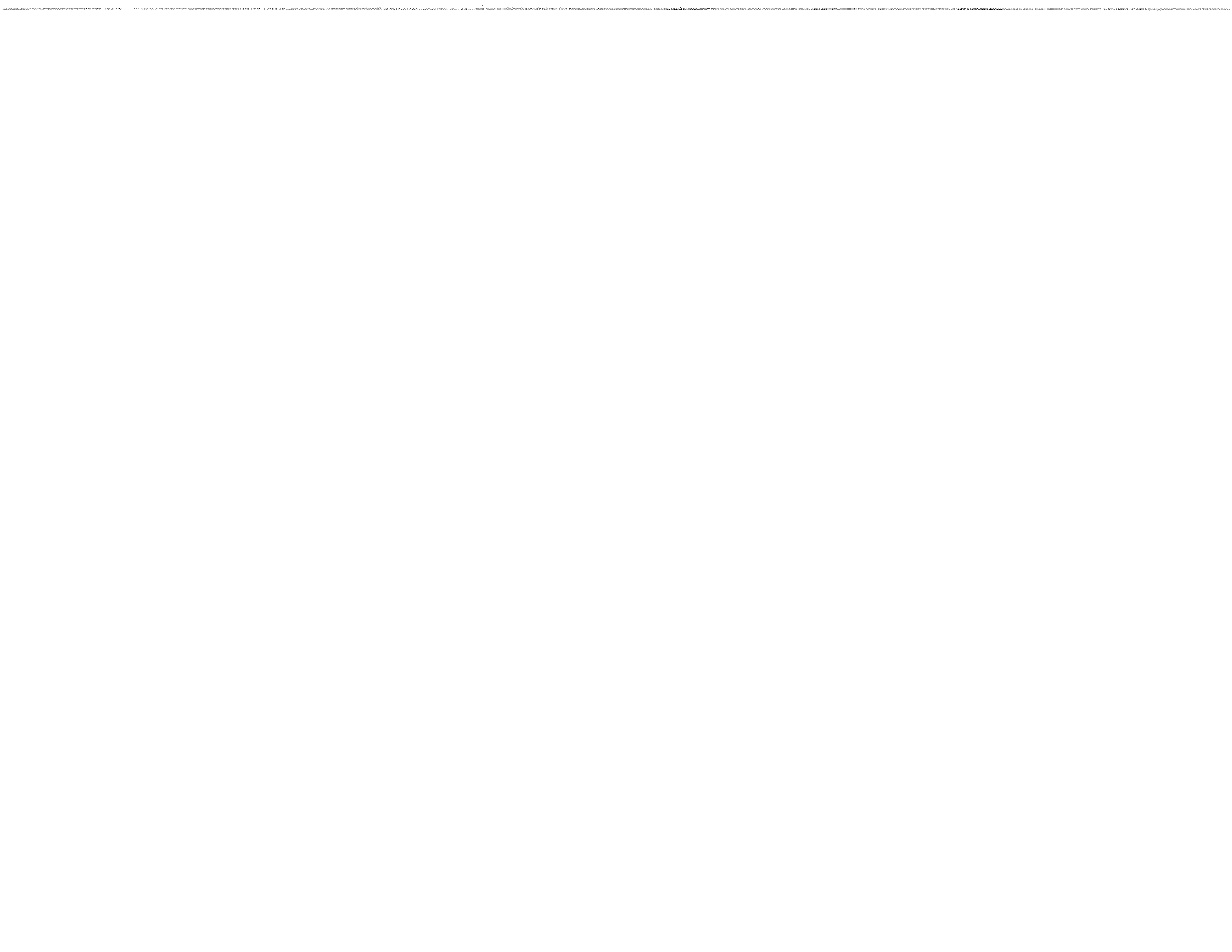




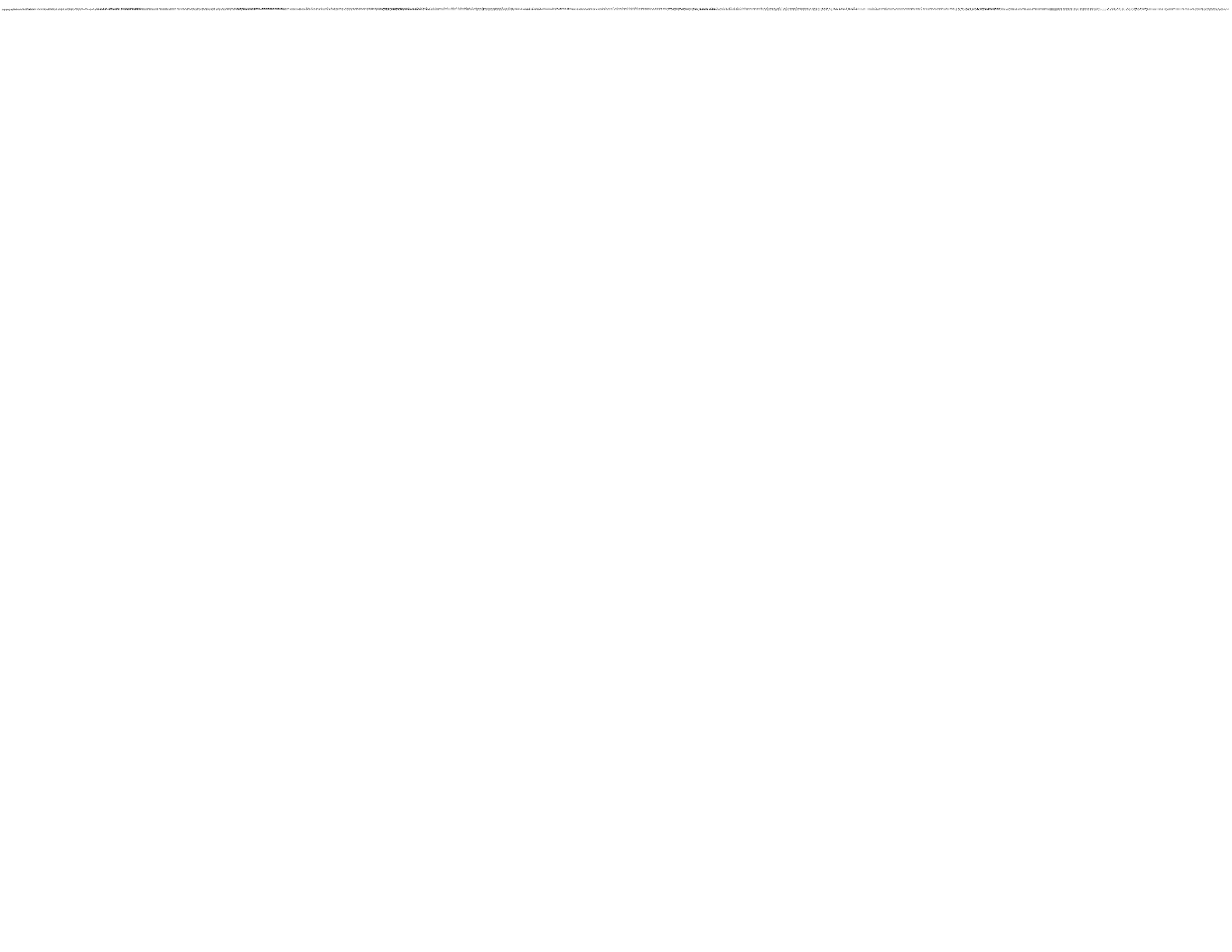


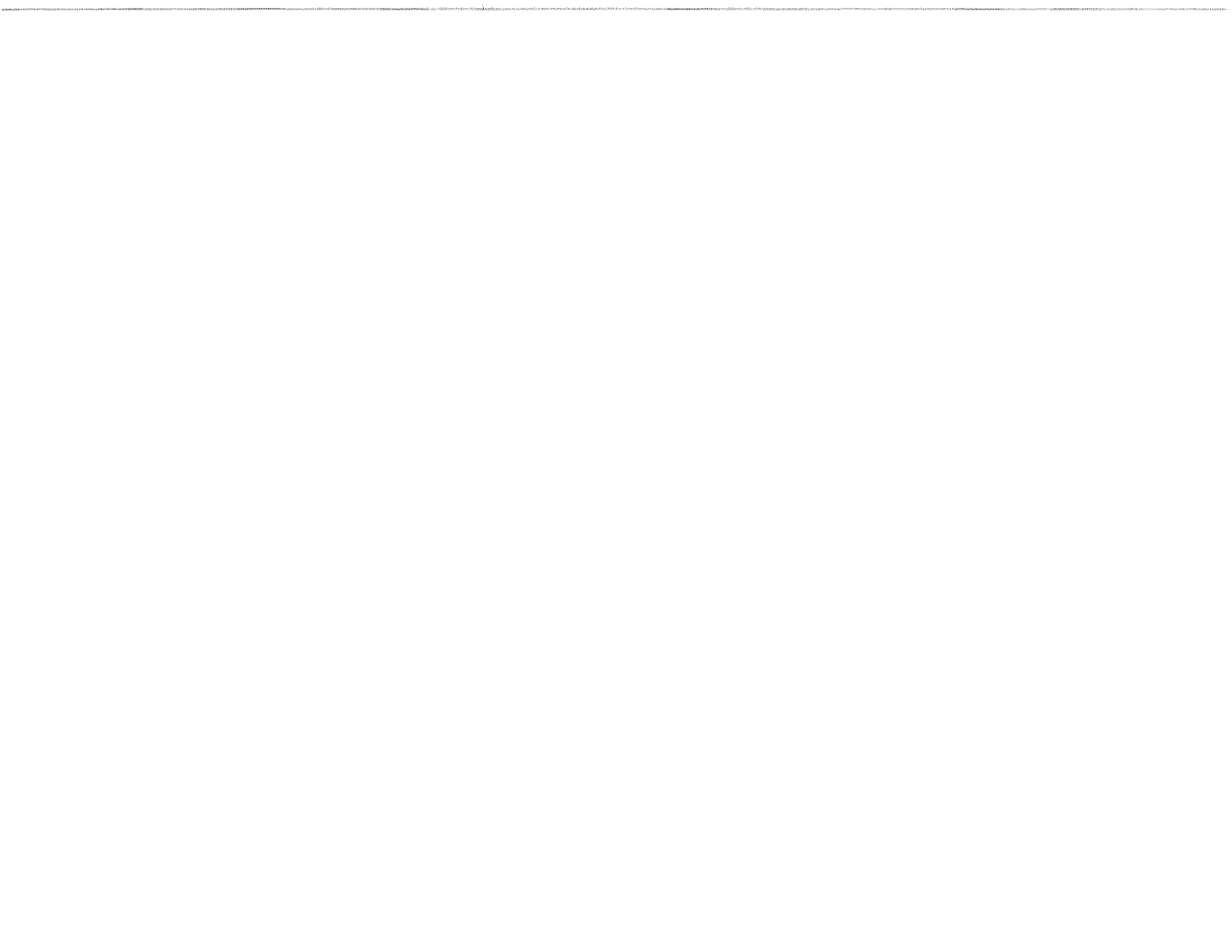


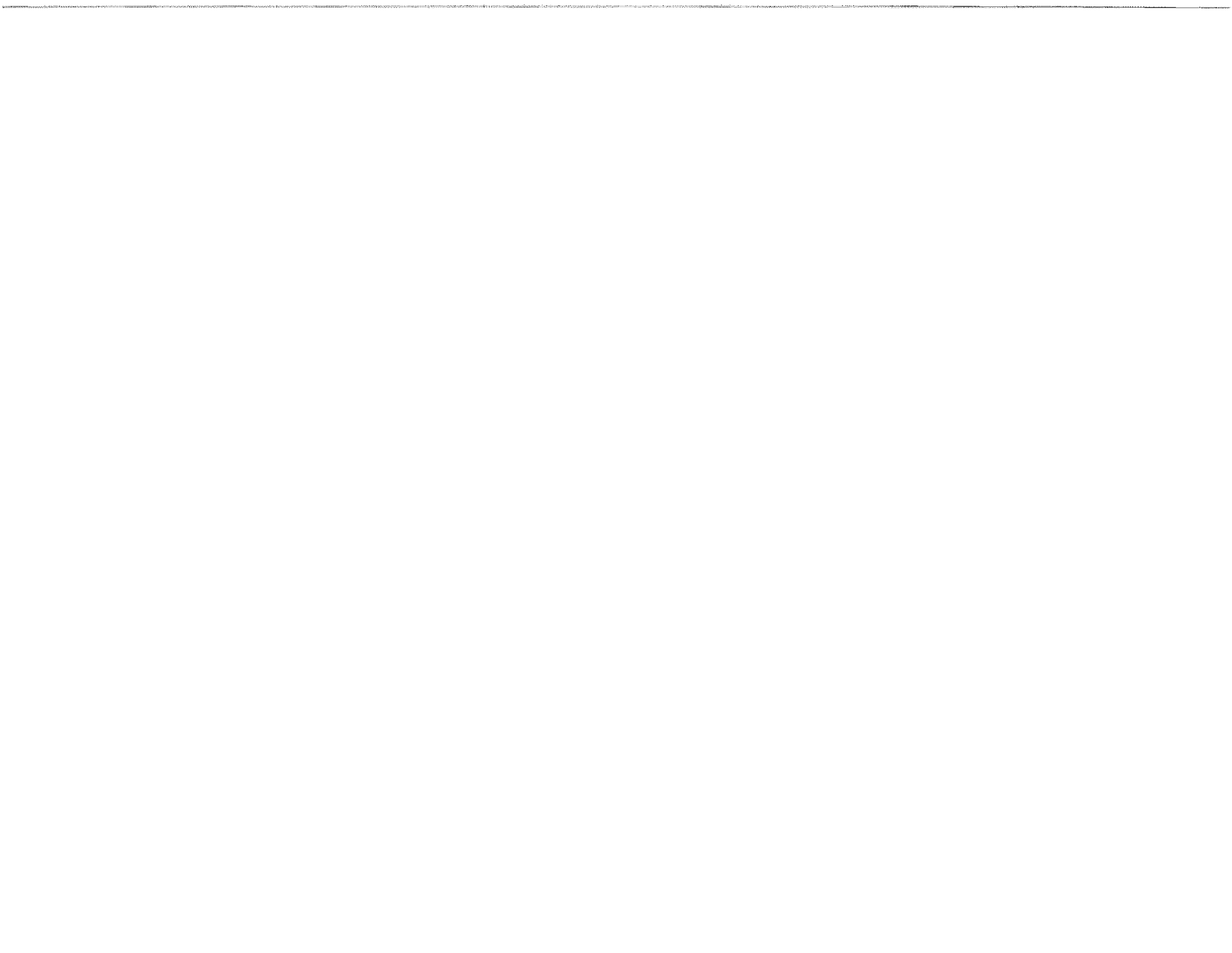


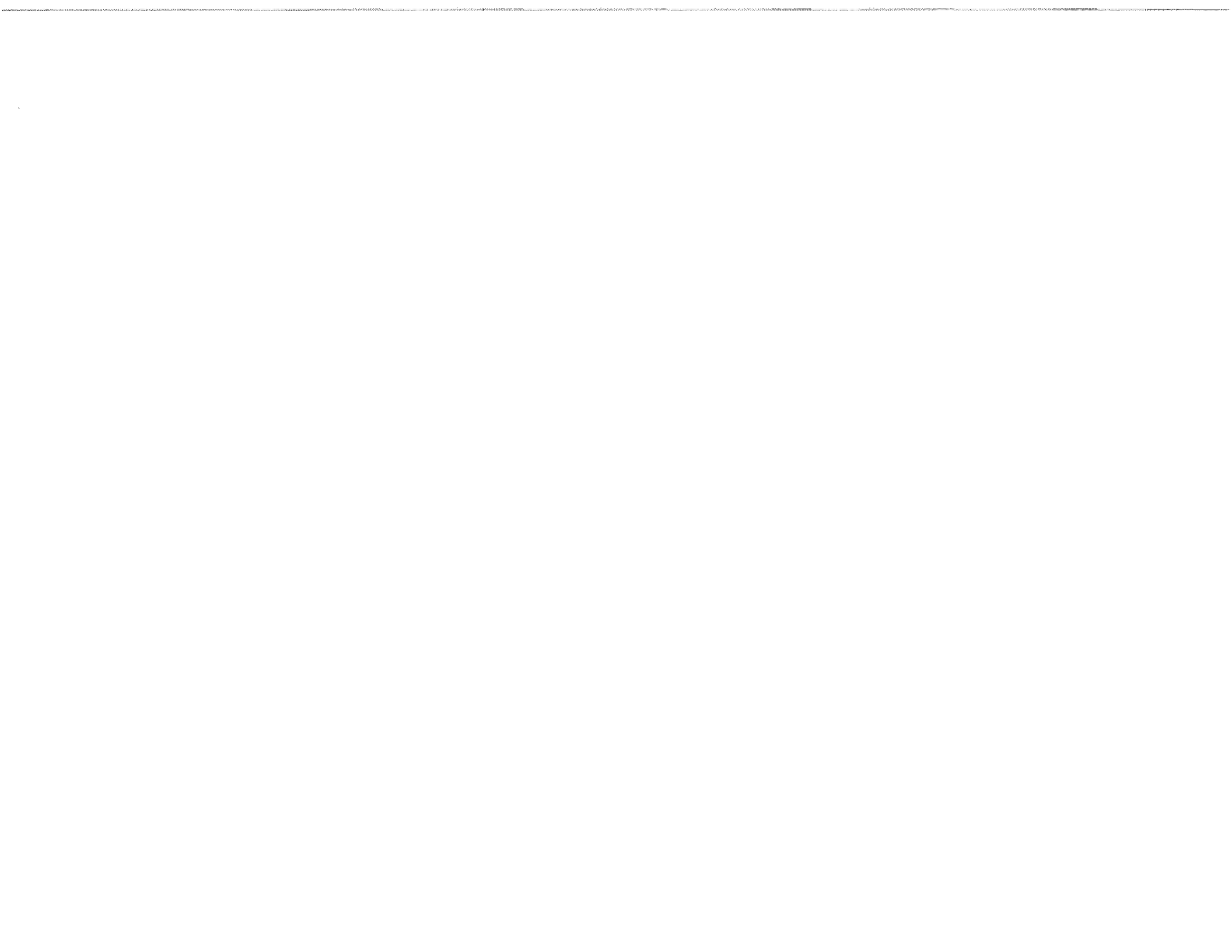


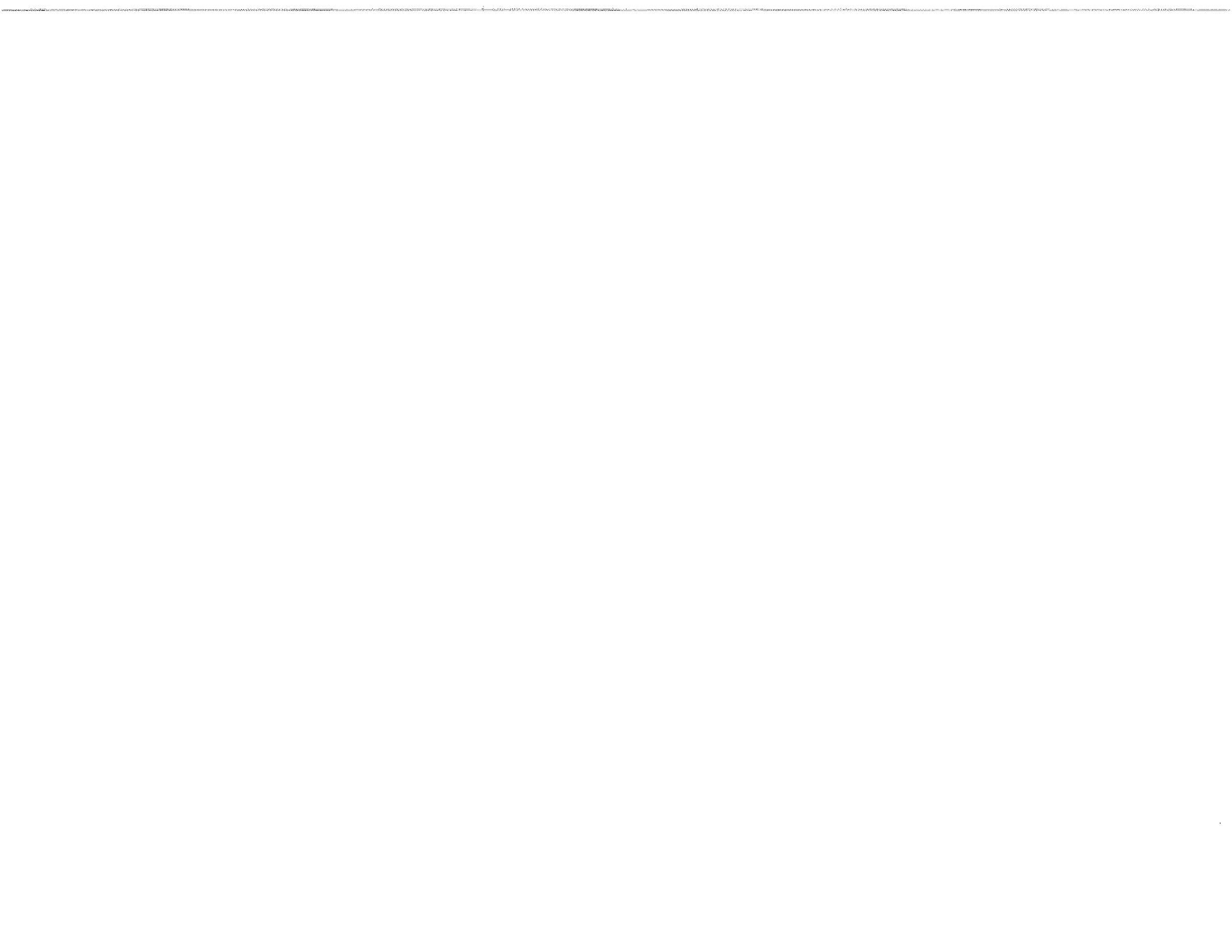




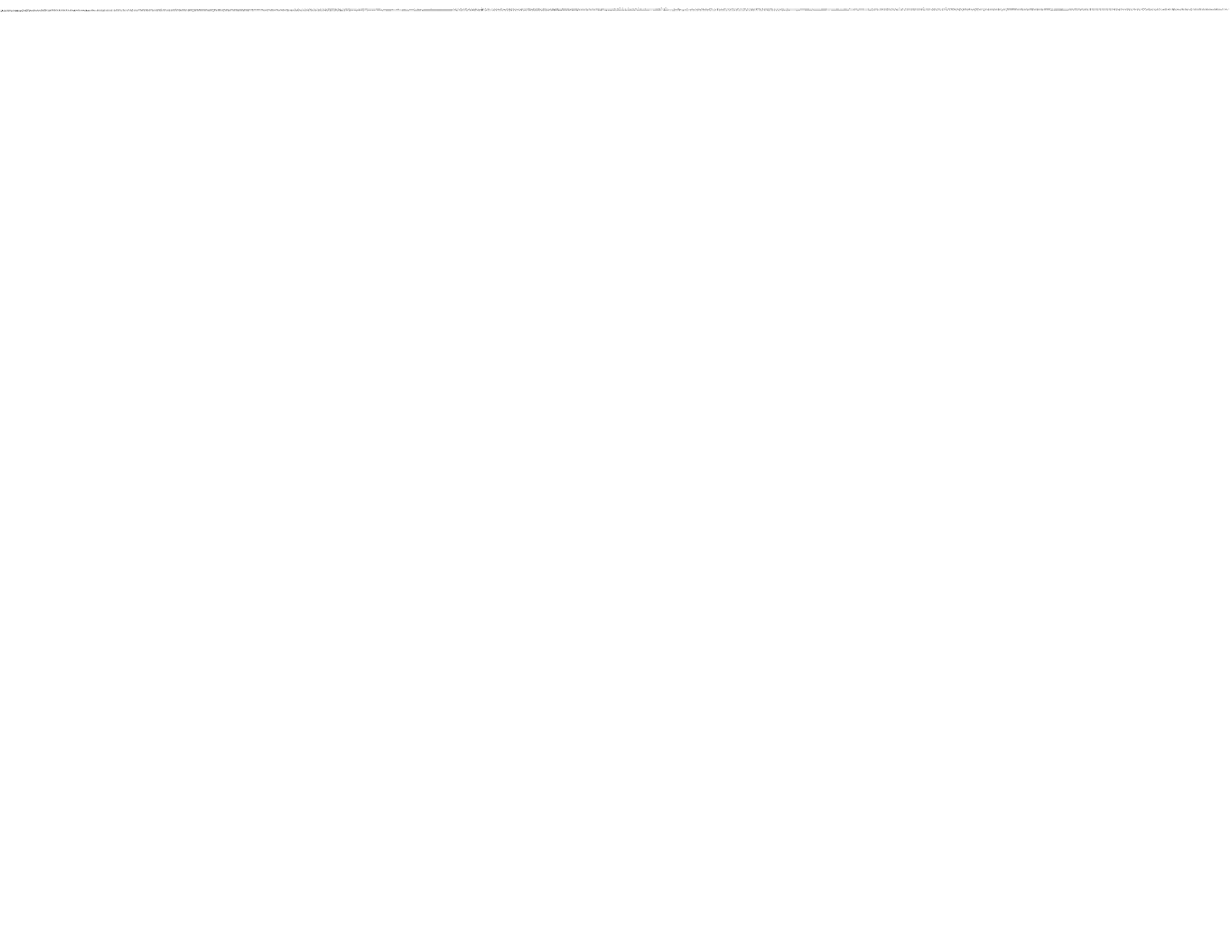














## AF Performance Goals

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Print Date: October 31, 2019

Selected Parameters:

Office: Both

Start Date: 10/01/2018

End Date: 09/30/2019

\*Exception: YES



# AF Performance Goals

(Confidential and Sensitive)

## RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
<b>Processed</b>						
2018	YE	H_S_P_UNAUTH	N	01/31/2019	04/09/2019	
2018	YE	H_S_P_UNAUTH	N	01/31/2019	04/01/2019	
2018	30G	UNAUTH	N	12/06/2018	03/19/2019	
2018	30G	AUTH	N	12/06/2018	02/04/2019	
2018	M11	P_UNAUTH	N	11/20/2018	02/04/2019	
2018	12G	UNAUTH_Q	Y	10/25/2018	03/12/2019	
2018	12G	AUTH	Y	10/25/2018	12/10/2018	
2018	12G	UNAUTH_M	Y	10/25/2018	12/10/2018	
2018	M10	P_UNAUTH	Y	10/20/2018	12/04/2018	
2018	Q3	H_S_P_UNAUTH	N	10/15/2018	11/27/2018	
2018	Q3	H_S_P_UNAUTH	Y	10/15/2018	11/26/2018	
2018	M9	P_UNAUTH	N	09/20/2018	10/29/2018	
2018	12P	AUTH	Y	08/30/2018	10/22/2018	
2018	12P	AUTH	Y	08/23/2018	10/22/2018	
2018	12P	AUTH	Y	08/16/2018	10/15/2018	
2018	12P	AUTH	Y	08/02/2018	10/01/2018	
2019	MY	UNAUTH	N	07/31/2019	09/24/2019	
2019	Q2	H_S_P	N	07/15/2019	08/28/2019	
2019	Q1	H_S_P	N	04/15/2019	06/11/2019	
2019	M2	P_UNAUTH	N	02/20/2019	04/15/2019	

Total AF Reports Processed	20
Average Processing Days	60.45
Percentage to Goal	80.00%

(b) (7)(E)

### Processed - No committees

Year	Type	Description	Election Sensitive	Due Date	Action Date	(b) (7)(E)
2018	30GR	AUTH	N	01/07/2019	02/11/2019	
2018	30SGR	AUTH	N	12/27/2018	02/11/2019	
2018	30GR	AUTH	N	12/20/2018	02/11/2019	



# AF Performance Goals

(Confidential and Sensitive)

## Processed - No committees

Action Date

Year	Report ID	Auth Status	Processed	Action Date	Review Date
2018	M12	P_UNAUTH	N	12/20/2018	02/11/2019
2018	30SG	AUTH	N	12/06/2018	02/04/2019
2018	12GR	AUTH	Y	11/26/2018	02/04/2019
2018	12SGR	AUTH	Y	11/15/2018	12/17/2018
2018	12GR	AUTH	Y	11/08/2018	12/11/2018
2018	12SG	AUTH	Y	10/25/2018	12/04/2018
2018	M10	P_UNAUTH	N	10/20/2018	11/29/2018
2018	30SG	AUTH	N	09/06/2018	10/22/2018
2018	12P	AUTH	Y	08/31/2018	10/22/2018
2018	12P	AUTH	Y	08/25/2018	10/22/2018
2018	M8	P_UNAUTH	N	08/20/2018	10/15/2018
2018	12PR	AUTH	Y	08/16/2018	10/15/2018
2018	12P	AUTH	Y	08/13/2018	10/09/2018
2018	12P	AUTH	Y	08/09/2018	10/09/2018
2018	12PR	AUTH	Y	08/02/2018	10/01/2018
2019	M7	P_UNAUTH	N	07/20/2019	09/12/2019
2019	12SPR	AUTH	Y	06/27/2019	08/22/2019
2019	30SG	AUTH	N	06/20/2019	08/19/2019
2019	M6	P_UNAUTH	N	06/20/2019	08/13/2019
2019	M5	P_UNAUTH	N	05/20/2019	06/26/2019
2019	12SG	AUTH	Y	05/09/2019	06/26/2019
2019	12SP	AUTH	Y	05/02/2019	06/26/2019
2019	M4	P_UNAUTH	N	04/20/2019	06/17/2019
2019	12SP	AUTH	Y	04/18/2019	06/17/2019
2019	M3	P_UNAUTH	N	03/20/2019	04/22/2019
2019	30GR	AUTH	N	02/07/2019	04/08/2019
2019	12GR	AUTH	Y	12/27/2018	02/25/2019

(b) (7)(E)

Total AF Reports Processed-No Committees	30
Average Processing Days	51.57
(b) (7)(E)	
Percentage to Goal	93.33%



# AF Performance Goals

(Confidential and Sensitive)

Total AF Reports 50

Average Processing Days 55.12

(b) (7)(E)

Percentage to Goal 88.00%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters

RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters

processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.



# AF Performance Goals

(Confidential and Sensitive)

## OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2018	Q1	3397	C00368415	08/08/2018	10/02/2018	55	Y
2018	Q2	3455	C00381517	11/01/2018	12/21/2018	50	Y
2018	Q2	3460	C00638825	10/25/2018	11/06/2018	12	Y
2018	Q2	3463	C00634873	10/29/2018	11/08/2018	10	Y
2018	Q2	3471	C00637728	10/30/2018	12/19/2018	50	Y
2018	12P	3487	C00660126	11/13/2018	02/05/2019	84	N
2018	M9	3489	C00147231	12/18/2018	02/14/2019	58	Y
2018	Q3	3496	C00679068	02/01/2019	03/27/2019	54	Y
2018	Q3	3501	C00131706	01/28/2019	03/29/2019	60	Y
2018	Q3	3519	C00668137	02/05/2019	03/12/2019	35	Y
2018	Q3	3526	C00641035	01/28/2019	03/22/2019	53	Y
2018	Q3	3528	C00661173	01/28/2019	03/15/2019	46	Y
2018	Q3	3533	C00634873	01/28/2019	03/13/2019	44	Y
2018	Q3	3544	C00614305	01/28/2019	03/13/2019	44	Y
2018	M10	3547	C00147231	01/31/2019	02/14/2019	14	Y
2018	12G	3552	C00147231	01/31/2019	02/14/2019	14	Y
2018	48H	3562	C00647081	01/28/2019	03/27/2019	58	Y
2018	30G	3572	C00666131	03/19/2019	05/16/2019	58	Y
2018	48H	3574	C00653196	04/19/2019	05/14/2019	25	Y
2018	12G	3588	C00450866	03/19/2019	05/16/2019	58	Y
2018	12G	3598	C00272724	03/21/2019	04/17/2019	27	Y
2018	48H	3618	C00431353	05/15/2019	07/10/2019	56	Y
2018	48H	3619	C00671859	06/20/2019	08/16/2019	57	Y
2018	30G	3622	C00492579	05/03/2019	06/05/2019	33	Y



# AF Performance Goals

(Confidential and Sensitive)

2018	30G	3624	C00658757	04/29/2019	05/23/2019	24	Y
2018	30G	3636	C00650432	05/15/2019	06/21/2019	37	Y
2018	30G	3644	C00157941	04/30/2019	06/12/2019	43	Y
2018	30G	3645	C00131706	04/30/2019	05/20/2019	20	Y
2018	30G	3655	C00522458	04/30/2019	06/13/2019	44	Y
2018	YE	3664	C00324780	04/15/2019	06/12/2019	58	Y
2018	YE	3665	C00658757	04/29/2019	05/23/2019	24	Y
2018	YE	3667	C00216184	04/29/2019	06/12/2019	44	Y
2018	YE	3677	C00516922	05/06/2019	06/18/2019	43	Y
2018	YE	3687	C00670992	05/15/2019	07/10/2019	56	Y
2018	YE	3690	C00656744	05/15/2019	07/02/2019	48	Y
2018	YE	3707	C00661181	05/06/2019	06/14/2019	39	Y
2018	YE	3718	C00433672	05/06/2019	07/03/2019	58	Y

Total Challenges Processed 37

Average Processing Days 43.05

Total Reports Processed within 60 Days 36

Percentage to Goal 97.30%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

Administrative Fine Program  
Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19 (9/30/19)
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$131,164	\$343,987

(b) (7)(E)



**RECEIVED**

By Office of the Commission Secretary at 12:37 pm, Jan 30, 2020

**SENSITIVE**



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AGENDA DOCUMENT NO. X20-02  
AGENDA ITEM  
For meeting of February 11, 2020

January 30, 2020

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista J. Roche *KJR*  
Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Dayna C. Brown *DCB*  
Acting Assistant Staff Director  
Audit Division

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2020 – 1<sup>st</sup> Quarter Highlights (10/1/19 – 12/31/19)

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### **Administrative Fine Program (Office of Administrative Review)**

During the first quarter of FY 2020, RAD processed 4 Reason to Believe (RTB) and 8 Final Determination recommendation memoranda, which are awaiting Commission vote. OAR received 1 challenge and processed 2 Reviewing Officer Recommendations (ROR). OAR also processed 3 final determination recommendation memoranda, which are awaiting Commission vote. The Commission collected \$5,339 in fine payments.

**(b) (7)(E)**


(b) (7)(E) Additionally, OAR forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

In the first quarter, the Reviewing Officer led the implementation of new financial reports for ADRO and OGC civil penalties. The reports meet OCFO and Treasury Report on Receivables requirements and greatly streamline the monthly financial reporting process. The Reviewing Officer continues to work with ADRO and OGC staff to finalize new procedures and on the new reporting process in the first quarter of FY 2020 and continue to provide assistance as necessary. The Reviewing Officer also began to collaborate with OCIO on the redesign of the Administrative Fine Calculator for the new website.









# Status of Compliance

FY 2020  
(10/1/2019 - 12/31/2019)



**Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data**

**Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent**

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20 <small>(12/31/19)</small>
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%	94.1%	99.1%
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	99.0%	99.9%	99.7%
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%	100%



## Matters Awaiting a Commission Vote as of 1/30/20

Audit	Admin Fine Program/OAR	ADRO	Total
1	20/3	21	45

## Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

## Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2019 Performance Goals	Status 12/31/19
<p>RAD staff collaborated with OCIO on the development and user acceptance testing of FEC Form 3X for the NextGen Efiling System.</p>	<p>Form 3X is expected to be completed in the second quarter of FY2020, with the other forms to follow.</p>
<p>RAD staff collaborated with the Information Division on reporting &amp; FECfile webinars for Candidate Committees, PACs and Party Committees, and on the FEC regional conference for all committee types in San Diego.</p>	<p>The webinars were held in October, November and December 2019, and the regional conference was held in October 2019.</p>
<p>RAD staff collaborated with the Information Division on Party Committee reporting examples for the website and with OGC on the development of a web page for closed Administrative Termination and Debt Settlement Plans.</p>	<p>The reporting examples were posted in December 2019 and the new web page went live in October 2019.</p>

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

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

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20
RAD to review 75% of reports within 90 days of receipt	79.3%	92.9%	76.6%	92.2%	76%	88%
RAD to send 75% of RFAs within 40 days of report review	92%	92%	88%	88%	85%	86%
(b) (7)(E)	93.5%	100%	96.2%	96.9%	88%	100%
(b) (7)(E)	43%	56%	25%	45%	100%	N/A <sup>1</sup>
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	97%	81.8%	96.67%	100%	97%	100%
(b) (7)(E)	100%	100%	100%	99%	100%	100%

1 - No PFARs were circulated this quarter

Strategic Objective 4: Foster a Culture of High Performance

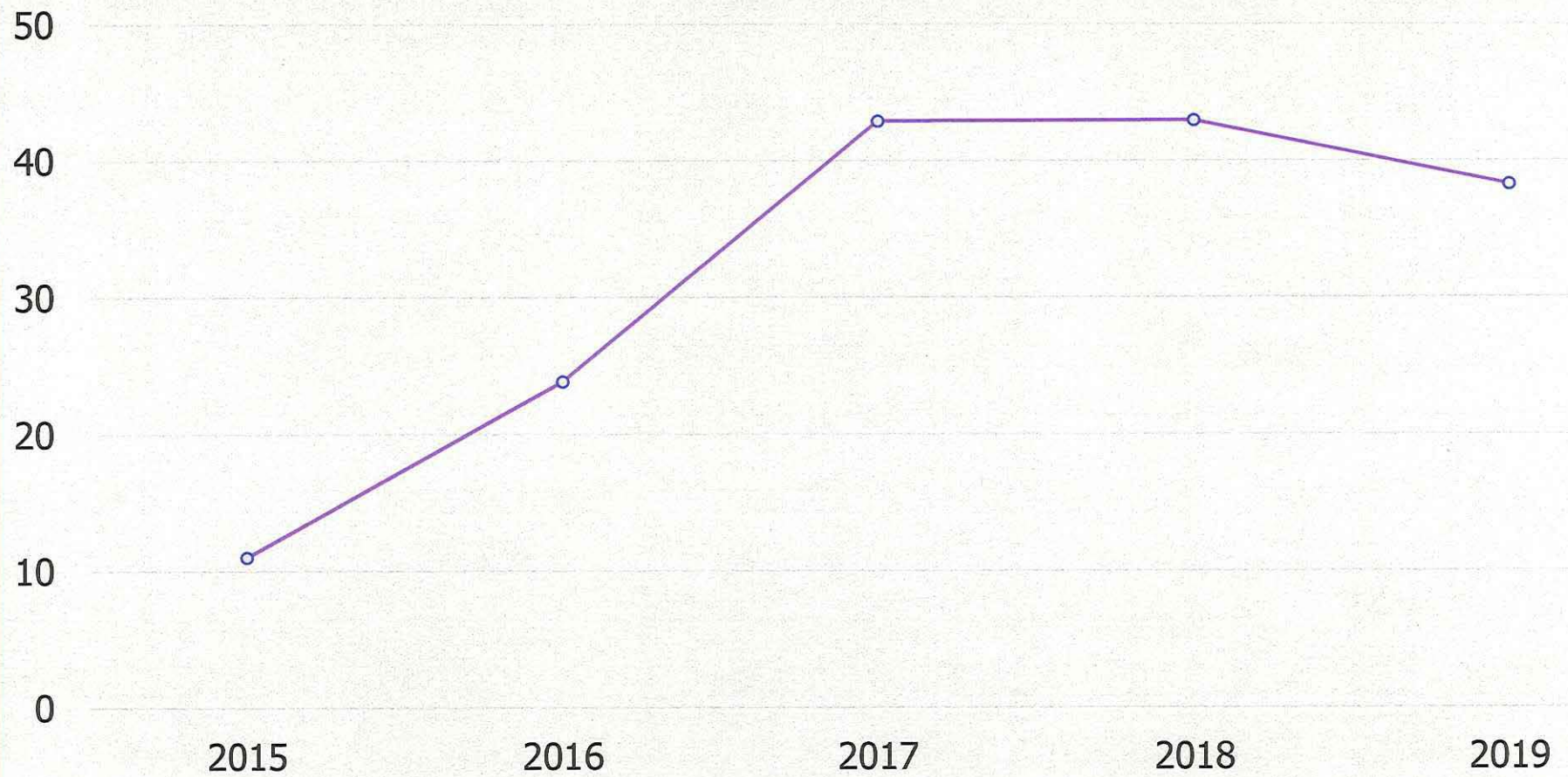
Performance Goal 1: Foster a workplace that delivers results

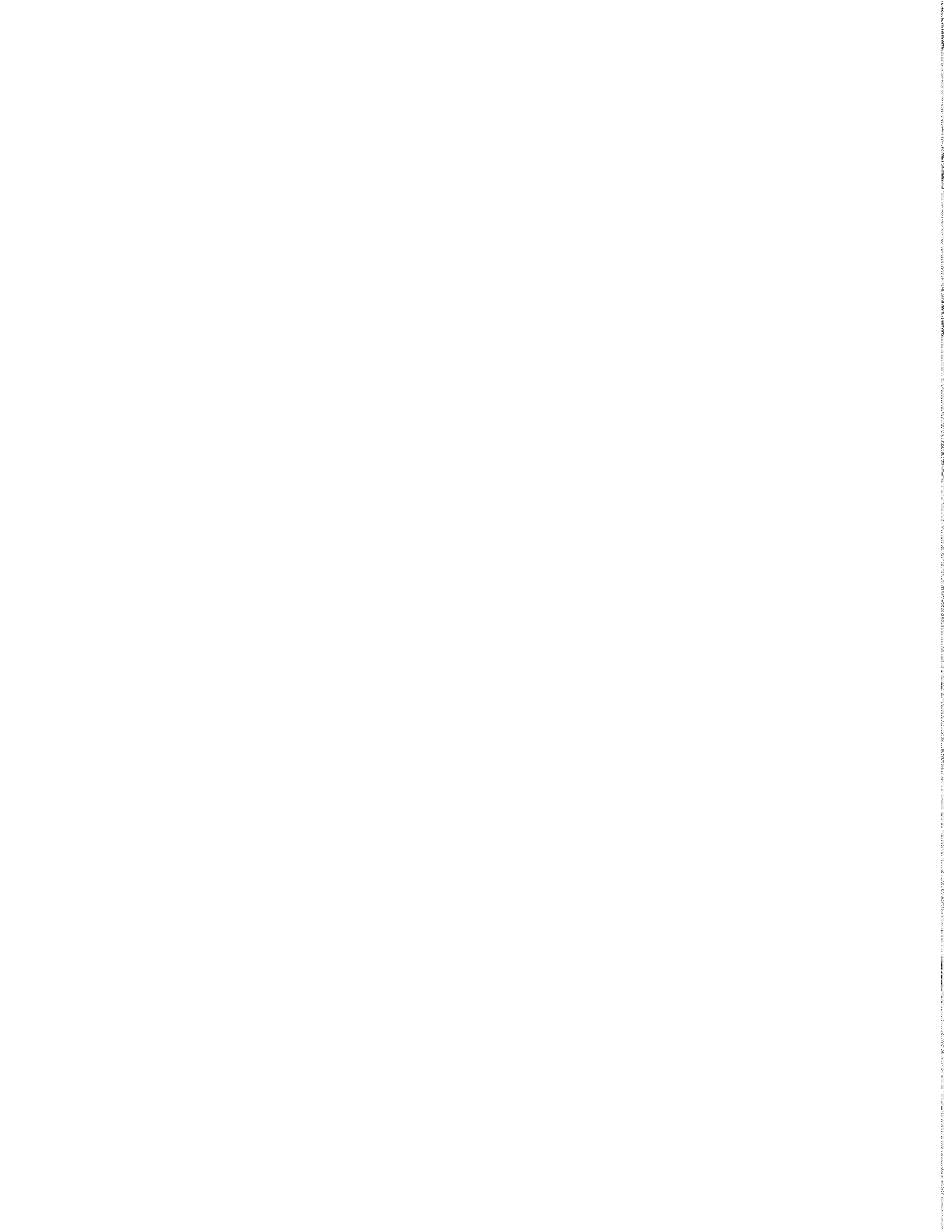
Office	Deliverable	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20 (12/31/19)
RAD	Documents/ Transactions Coded	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828	787/ 6,067,333
	Documents/Pages Processed in Paper Automation/ Conversion System	N/A	N/A	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417	472/ 4,955
	Documents/Pages Reviewed	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699	16,040/ 11,325,441
	Letters sent	13,433	13,253	14,796	13,763	12,562	2,075
	Telephone calls handled	11,822	12,362	11,634	13,036	13,149	2,411
	Email inquiries handled	N/A	N/A	N/A	396	658	168
	Referrals	91	43	95	46	82	9
	AF Cases RTB/FD	191/159	83/33	163/168	95/23	262/93	0/0
Audit	<b>(b) (7)(E)</b>						
ADRO							
OAR	Cases Received	35	12	29	8	37	1
	Cases Closed (FD)	32	11	32	10	36	0

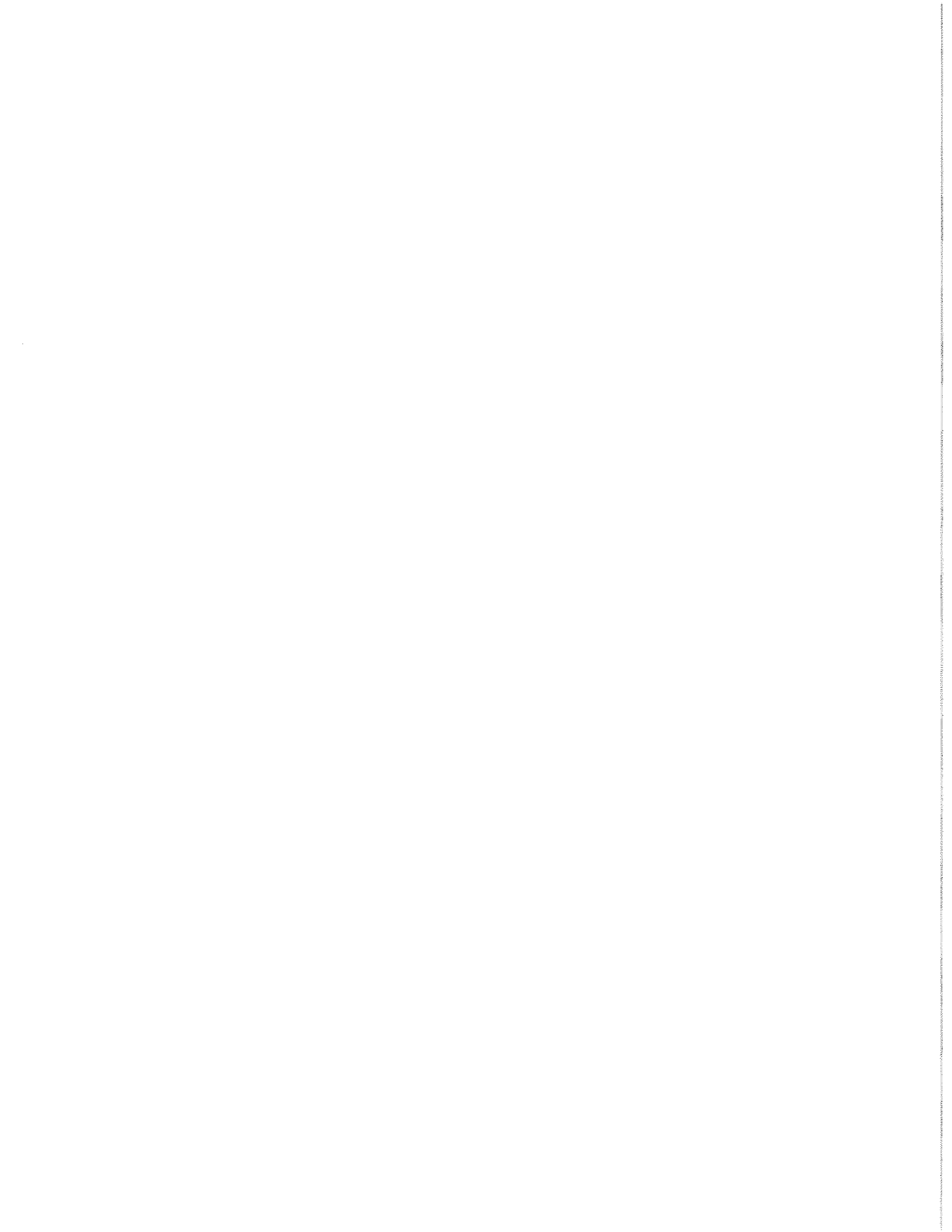
## RAD - Total Transactions Processed (millions)



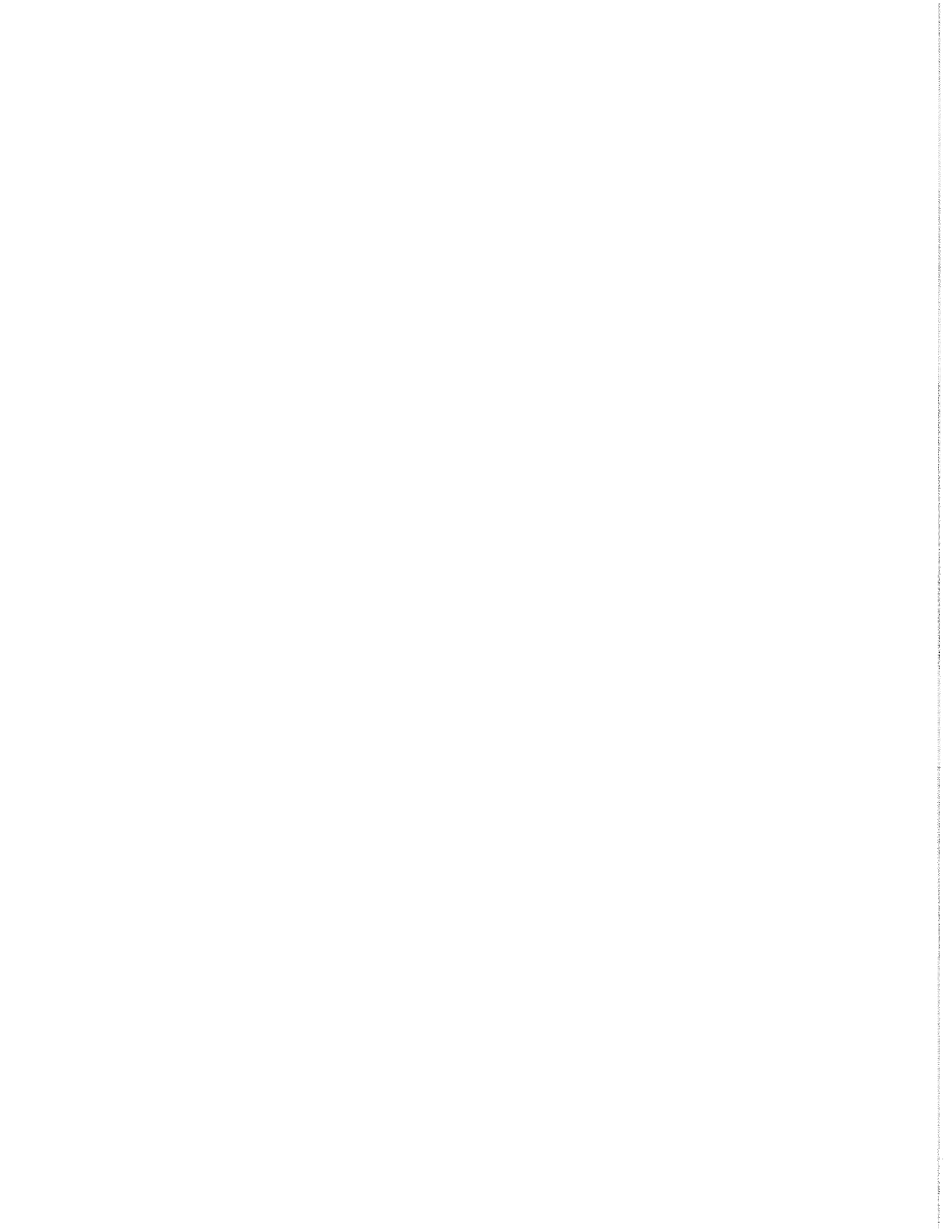
RAD - Total Pages Reviewed  
(millions)



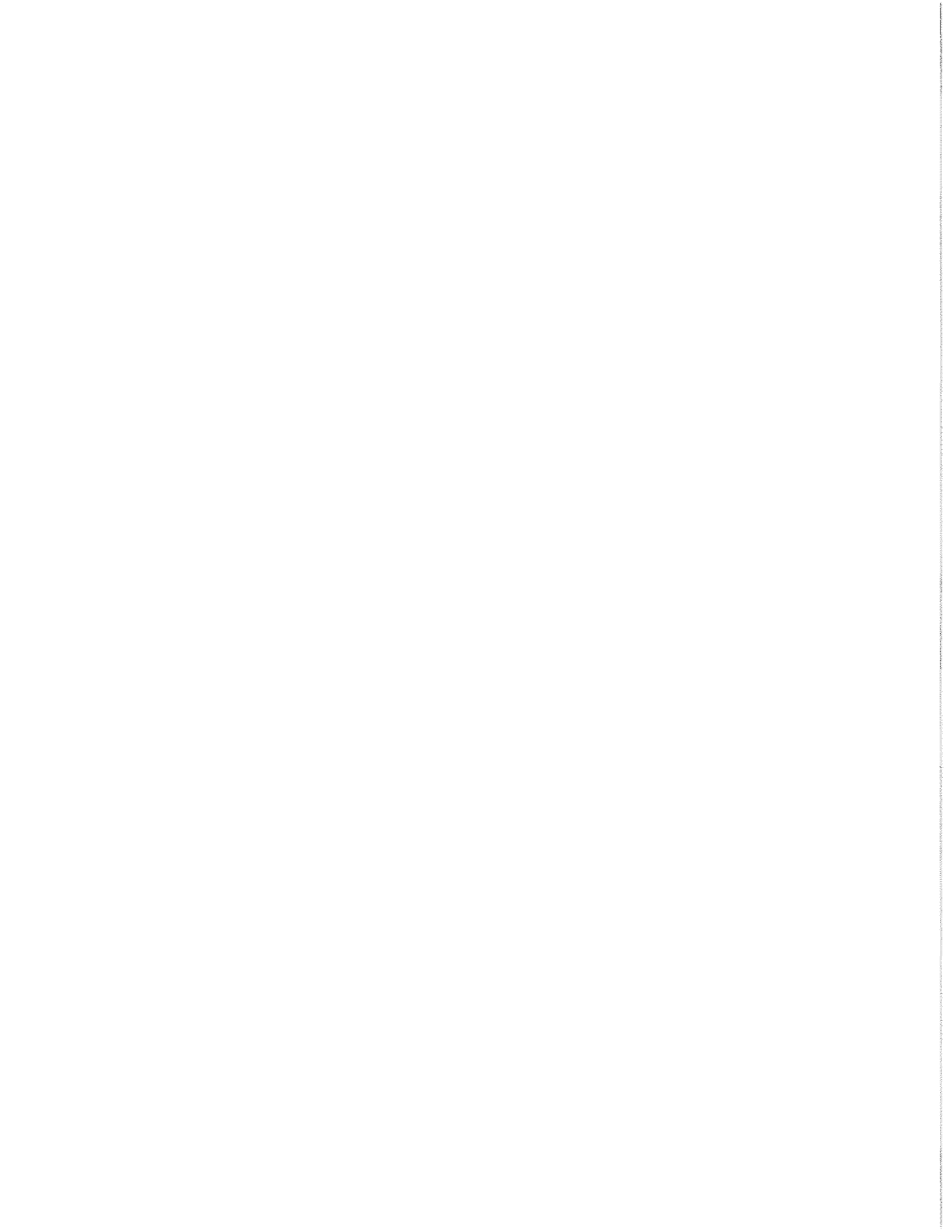


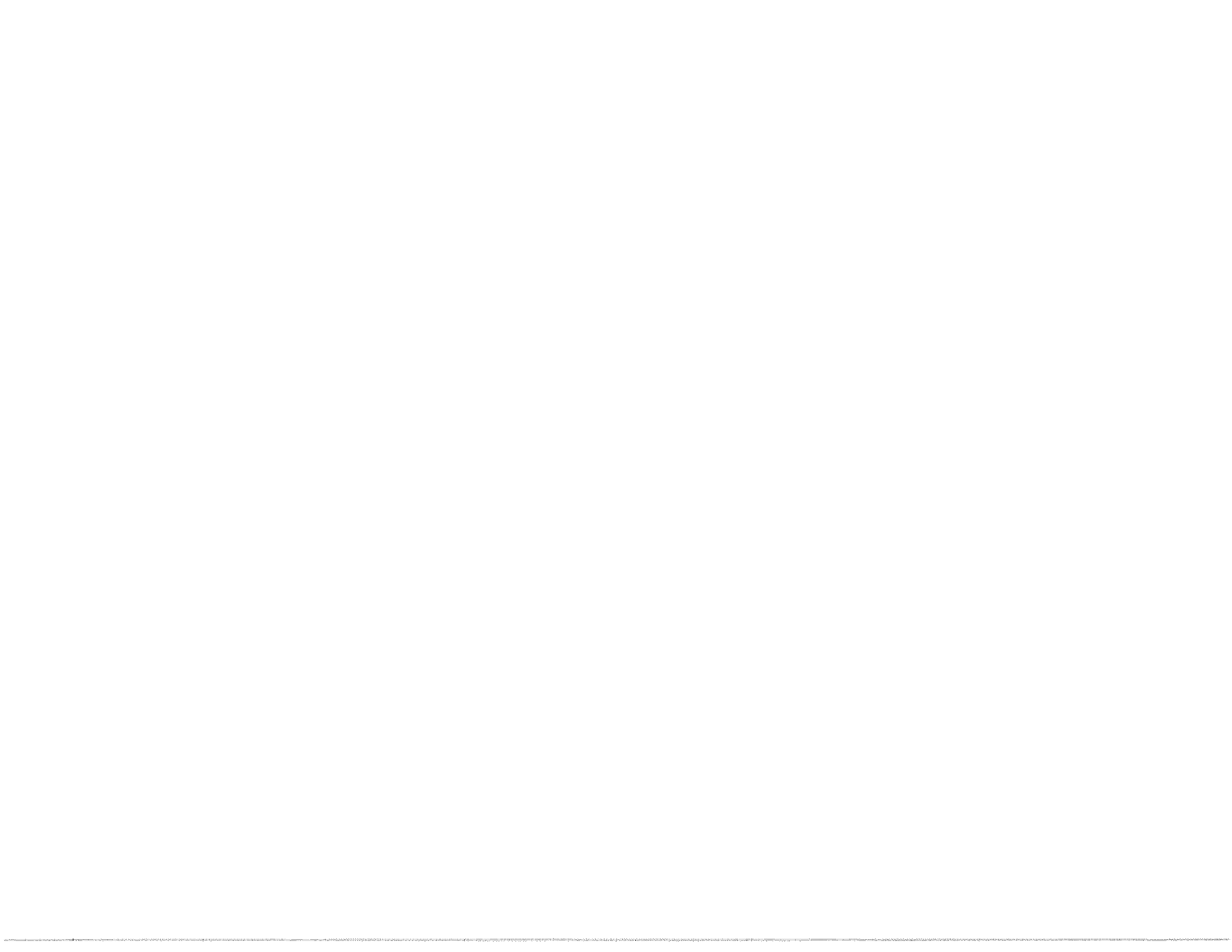


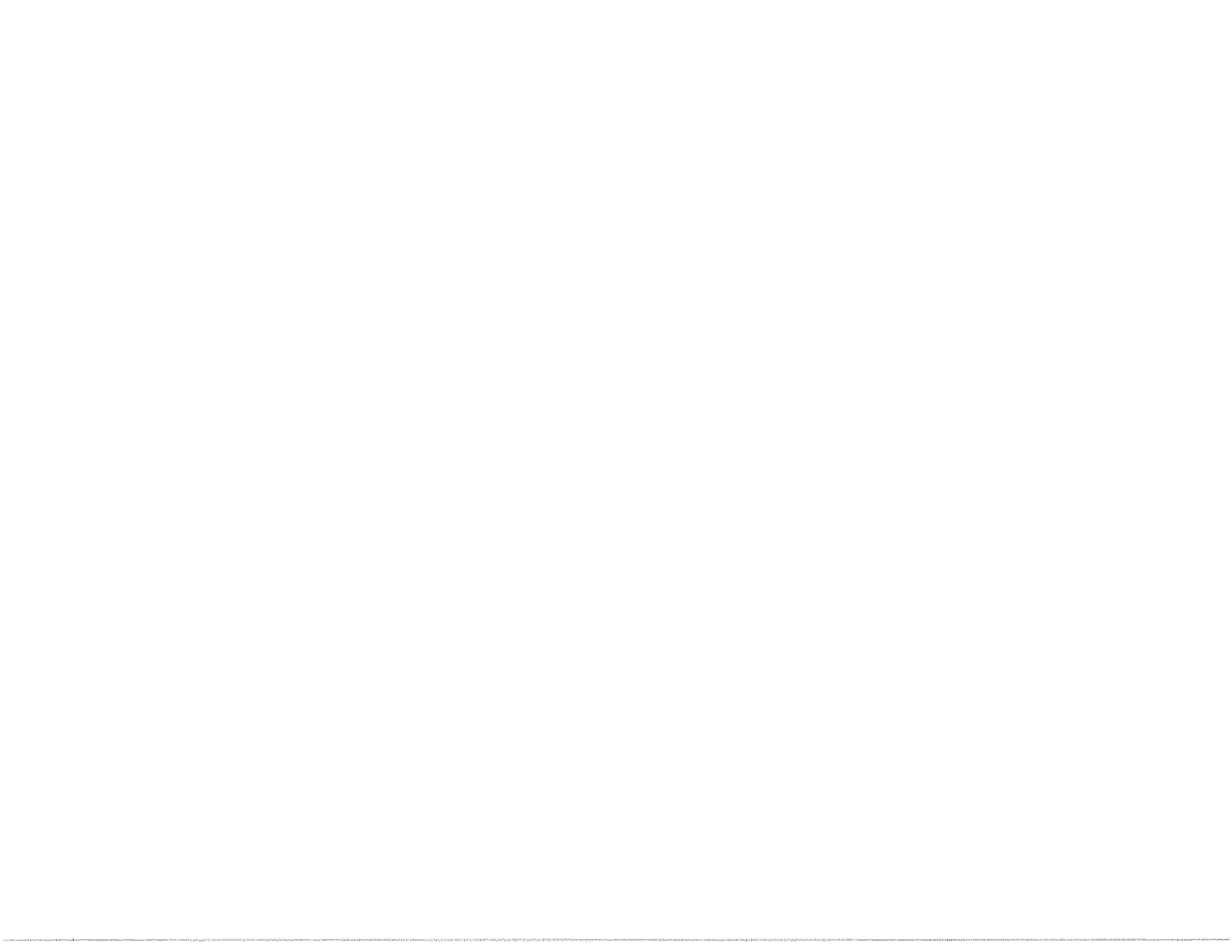


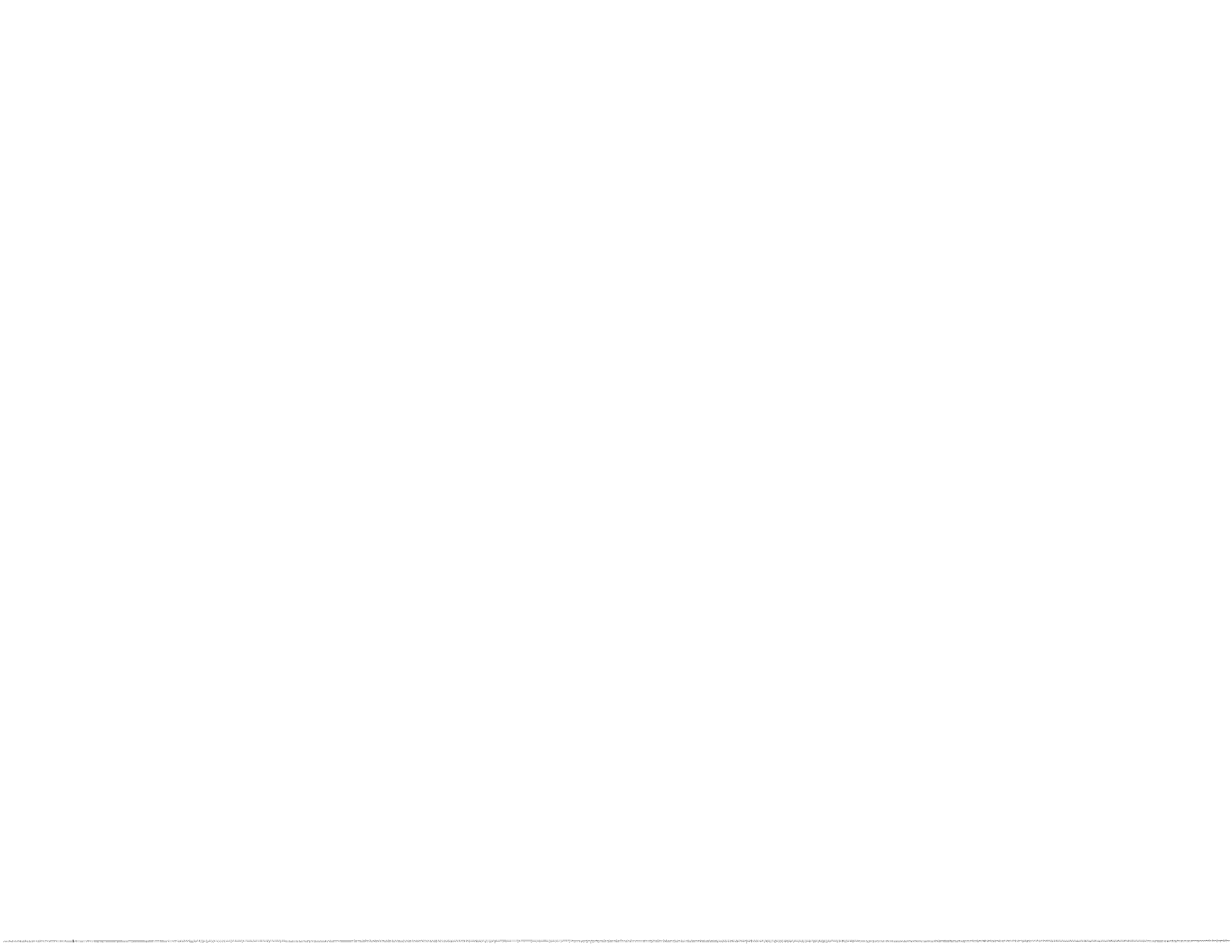


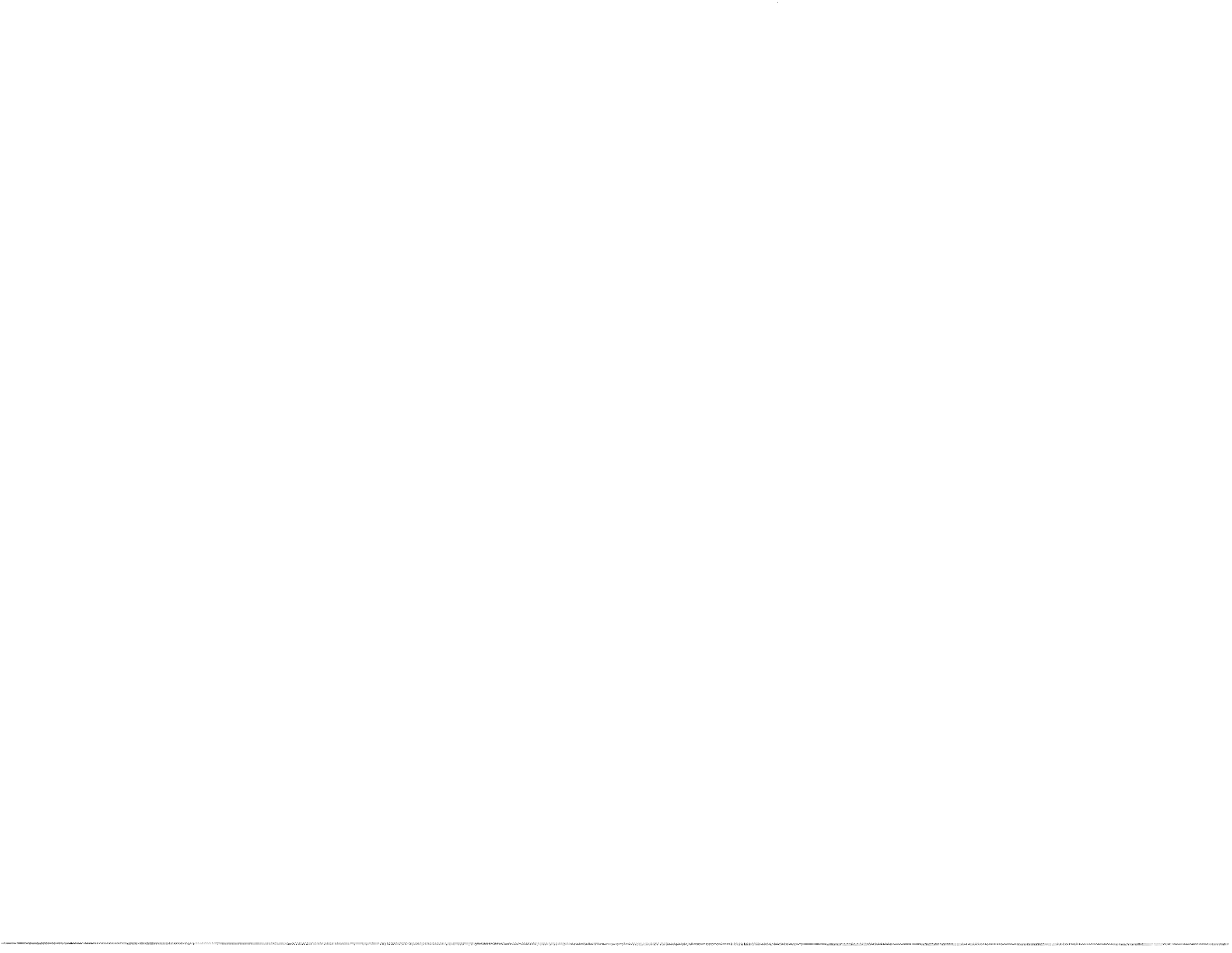


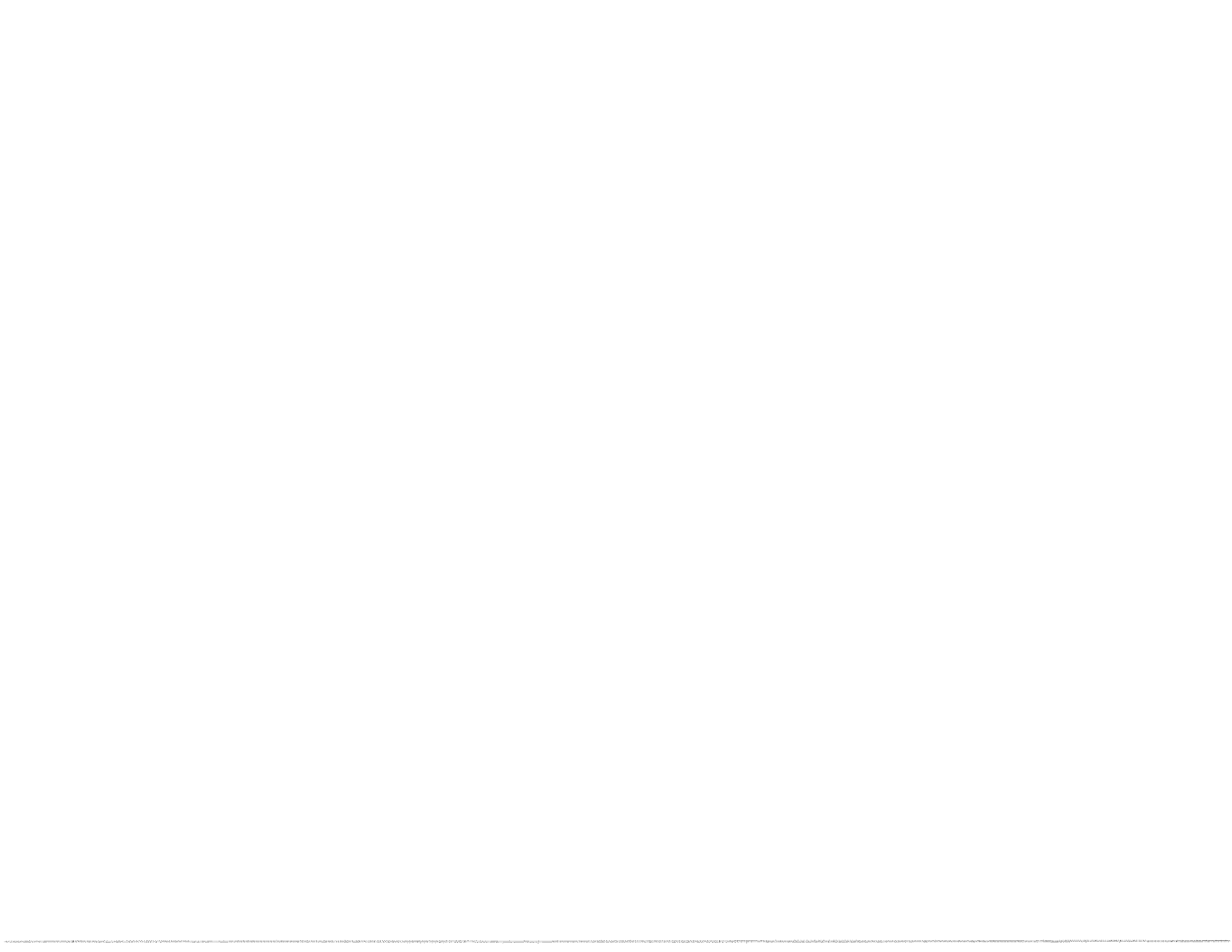




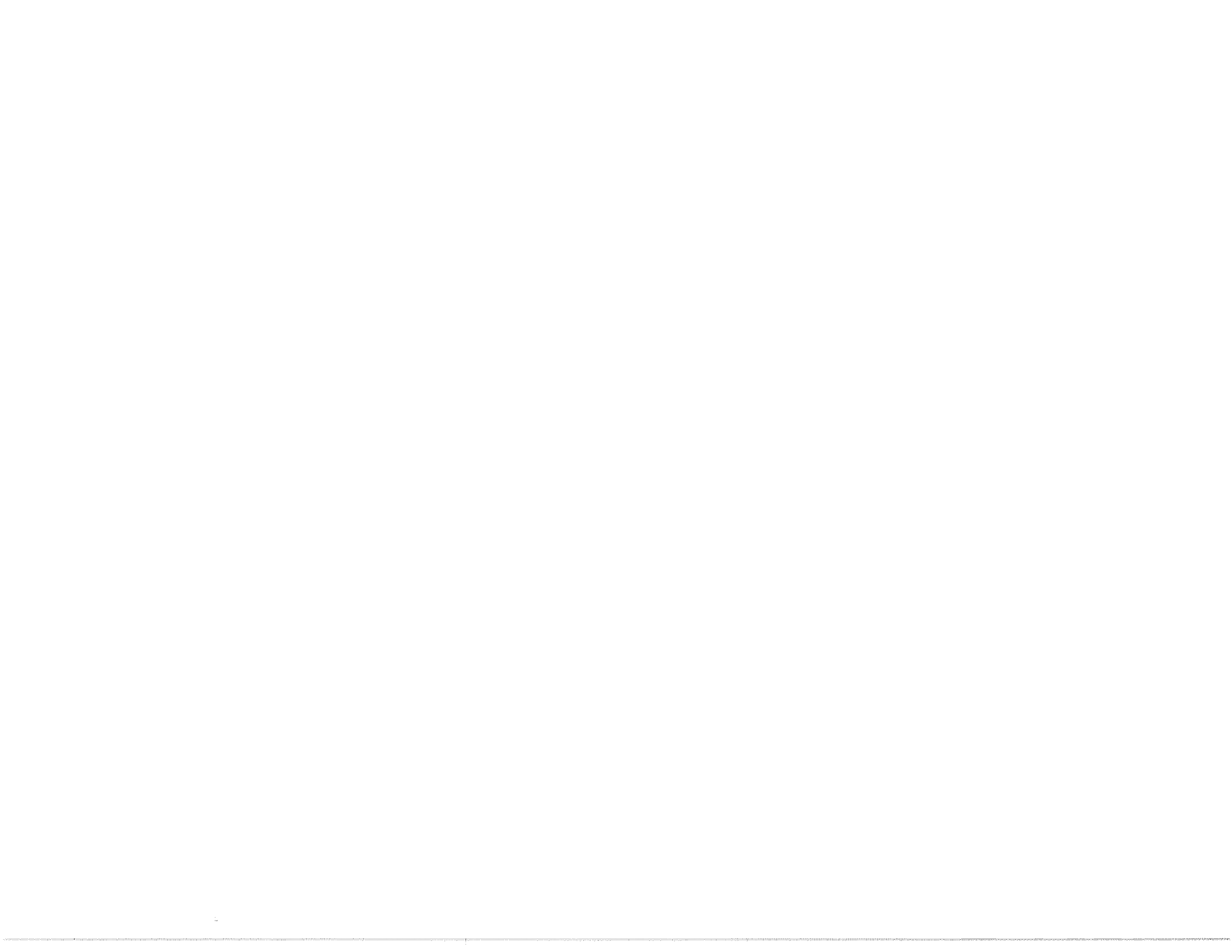












## Administrative Fine Program Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$131,164	\$343,987	N/A

**(b) (7)(E)**

**SENSITIVE**

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AGENDA DOCUMENT NO. X20-17  
AGENDA ITEM  
For meeting of May 12, 2020

April 30, 2020

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista Roche *KR*  
Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Dayna C. Brown *DCB*  
Acting Assistant Staff Director  
Audit Division

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2020 – 2nd Quarter Highlights (1/1/20 – 3/31/20)

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### **Administrative Fine Program (Office of Administrative Review)**

During the second quarter of FY 2020, RAD processed 4 Reason to Believe (RTB) and 1 Final Determination recommendation memoranda, which are awaiting Commission vote. <sup>(b) (7)(E)</sup>

OAR had no new challenges to process in the second quarter. The Commission collected \$5,856 in fine payments.

In the second quarter, the Reviewing Officer continued to assist ADR and OGC with processing civil penalty payments and completing financial reports for OCFO. The Reviewing Officer attended in-house OPM facilitated training on Engaging and Encouraging Employees and


began participating in the Partnership for Public Service Engagement Coordinator Collective to assist the agency in engagement planning.












# Status of Compliance

FY 2020  
(10/1/2019 – 3/31/2020)



## Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20 (3/31/20)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%	94.1%	<b>98.3%</b>
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	99.0%	99.9%	<b>99.8%</b>
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%	<b>100%</b>

## Matters Awaiting a Commission Vote as of 4/30/20

Audit	Admin Fine Program/OAR	ADRO	Total
2	25/3	41	71

## Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

## Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2020 Performance Goals	Status 3/31/20
<p>RAD staff collaborated with OCIO on the development and baseline testing of FEC Form 3X for the NextGen Efiling System.</p>	<p>Form 3X is expected to be completed and fully tested in the third quarter of FY2020, with the other forms to follow.</p>
<p>RAD staff collaborated with the Information Division on reporting &amp; FECfile webinars for Candidate Committees, PACs and Party Committees, on the FEC regional conference for all committee types in San Antonio, and on Independent Expenditure webinars.</p>	<p>Candidate, PAC and Party reporting and FECfile webinars were held in January 2020, the regional conference was held in February 2020, and the Independent Expenditure webinars and another candidate webinar were held in March 2020.</p>
<p>RAD commenced an electronic filing working group to develop feedback and formulate solutions to improve both customer service and knowledge of the electronic filing system.</p>	<p>The group met in March 2020 to brainstorm ideas. Future meetings will address ways to improve customer service including assisting the Electronic Filing Office (EFO) during filing deadlines, establishing procedures for transferring calls, and cross training analysts to assist with technical issues.</p>

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

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

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20
RAD to review 75% of reports within 90 days of receipt	79.3%	92.9%	76.6%	92.2%	76%	91.5%
RAD to send 75% of RFAs within 40 days of report review	92%	92%	88%	88%	85%	86%
(b) (7) (E)	93.5%	100%	96.2%	96.9%	88%	100%
	43%	56%	25%	45%	100%	N/A <sup>1</sup>
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	97%	81.8%	96.67%	100%	97%	100%
(b) (7) (E)	100%	100%	100%	99%	100%	100%

1 - No PFARs were circulated this quarter

## Strategic Objective 4: Foster a Culture of High Performance

## Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20 (3/31/20)
RAD	Documents/ Transactions Coded	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828	1,936/ 27,292,434
	Documents/Pages Processed in Paper Automation/ Conversion System	N/A	N/A	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417	1,362/ 14,789
	Documents/Pages Reviewed	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699	36,840/ 18,396,209
	Letters sent	13,433	13,253	14,796	13,763	12,562	5,572
	Telephone calls handled	11,822	12,362	11,634	13,036	13,149	5,871
	Email inquiries handled	N/A	N/A	N/A	396	658	404
	Referrals	91	43	95	46	82	14
	AF Cases RTB/FD	191/159	83/33	163/168	95/23	262/93	0/0
	Audit	<b>(b) (7)(E)</b>					
ADRO							
OAR	Cases Received	35	12	29	8	37	1
	Cases Closed (FD)	32	11	32	10	36	0

















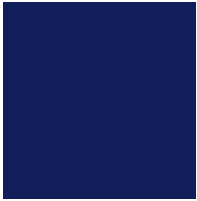












## AF Performance Goals

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Print Date: April 30, 2020

### Selected Parameters:

Office: Both

Start Date: 10/01/2019

End Date: 03/31/2020

\*Exception: YES

# AF Performance Goals

(Confidential and Sensitive)

## RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
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### Processed

2019	YE	H_S_P_UNAUTH	N	01/31/2020	03/26/2020	
2019	M12	P_UNAUTH	N	12/20/2019	02/12/2020	
2019	M11	P_UNAUTH	N	11/20/2019	01/13/2020	
2019	M10	P_UNAUTH	N	10/20/2019	12/04/2019	
2019	Q3	H_S_P	N	10/15/2019	12/04/2019	
2019	M9	P_UNAUTH	N	09/20/2019	11/18/2019	
2019	M8	P_UNAUTH	N	08/20/2019	10/08/2019	

Total AF Reports Processed 7

Average Processing Days 52.29

(b) (7)(E)

Percentage to Goal 100.00%

### Processed - No committees

Year	Type	Description	Election Sensitive	Due Date	Action Date	(b) (7)(E)
2019	M10	P_UNAUTH	Y	10/20/2019	12/05/2019	
2019	Q3	H_S_P	Y	10/15/2019	12/05/2019	
2019	30SG	AUTH	N	10/10/2019	11/18/2019	
2019	12SG	AUTH	Y	08/29/2019	10/28/2019	
2020	12SP	AUTH	Y	02/06/2020	03/30/2020	
2020	12SP	AUTH	Y	01/23/2020	03/23/2020	

Total AF Reports Processed-No Committees 6

Average Processing Days 51.50

(b) (7)(E)

Percentage to Goal 100.00%



# AF Performance Goals

(Confidential and Sensitive)

Total AF Reports 13

Average Processing Days 51.92

(b) (7)(E)

Percentage to Goal 100.00%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters  
RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters  
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H  
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.

# AF Performance Goals

(Confidential and Sensitive)

## OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2018	48H	3730	C00665554	09/30/2019	11/21/2019	52	Y
2018	48H	3738	C00675215	10/21/2019	12/12/2019	52	Y

Total Challenges Processed 2

Average Processing Days 52.00

Total Reports Processed within 60 Days 2

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

## Administrative Fine Program Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$131,164	\$343,987	N/A

(b) (7)(E)

**RECEIVED**

By Office of the Commission Secretary at 10:25 am, Jul 31, 2020



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

July 31, 2020

**MEMORANDUM**

AGENDA DOCUMENT NO. X20-36  
AGENDA ITEM  
For the meeting of August 18, 2020

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista Roche *KR*  
Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Dayna C. Brown *DCB*  
Acting Assistant Staff Director  
Audit Division

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2020 – 3rd Quarter Highlights (4/1/20 – 6/30/20)

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### **Administrative Fine Program (Office of Administrative Review)**

During the third quarter of FY 2020, RAD processed 10 Reason to Believe (RTB) memoranda. (b) (7)(E)

OAR had no new challenges to process in the third quarter.

The Commission approved RAD's RTB recommendations in 96 cases. In addition, the Commission made a final determination that the respondents in 206 cases violated 52 U.S.C. § 30104(a) and assessed \$531,552 in civil penalties. The Commission collected \$5,113 in fine payments.




In the third quarter, the Reviewing Officer collaborated with OCIO to launch a redesigned Administrative Fine Calculator for the website. The Reviewing Officer also worked with OGC and RAD to implement new procedures for the receipt of AF challenge documentation during COVID-19, which will now be submitted via email. With the high volume of RTB findings approved at the end of the third quarter, OAR expects to receive a high volume of challenges in the fourth quarter of FY 2020.










# Status of Compliance

FY 2020  
(10/1/2019 – 6/30/2020)



## Matters Awaiting a Commission Vote as of 7/31/20

Audit	Admin Fine Program/OAR	ADRO	Total
1	2/2	9	14

## Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20 (6/30/20)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%	94.1%	<b>99%</b>
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	99.0%	99.9%	<b>99.8%</b>
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%	<b>100%</b>

## Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

## Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2020 Performance Goals	Status 6/30/20
<p>RAD staff provided extended phone coverage from 5:30pm to 8:00pm for the 2020 July Quarterly reporting deadline.</p>	<p>The RAD mainline received and directed 55 calls between 5:30pm and 8:00pm on the April 15<sup>th</sup> deadline.</p>
<p>RAD staff collaborated with the Information Division on nine (9) reporting &amp; FECfile webinars for Candidate Committees, corporate, labor/member, and trade PACs, and Party Committees.</p>	<p>Party reporting and FECfile webinars were held in April 2020, corporate and labor/member PAC reporting webinars were held in May 2020, and Candidate and trade PAC reporting and FECfile webinars were held in June 2020.</p>
<p>RAD Assistant Staff Director provided a Best Practices for FEC Reporting and Compliance session for a national party legal compliance webinar.</p>	<p>The webinar was held in May 2020.</p>



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

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

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20
RAD to review 75% of reports within 90 days of receipt	79.3%	92.9%	76.6%	92.2%	76%	91.6%
RAD to send 75% of RFAs within 40 days of report review	92%	92%	88%	88%	85%	86%
<b>(b) (7)(E)</b>	93.5%	100%	96.2%	96.9%	88%	100%
	43%	56%	25%	45%	100%	N/A <sup>1</sup>
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	97%	81.8%	96.67%	100%	97%	100%
<b>(b) (7)(E)</b>	100%	100%	100%	99%	100%	100%

1 - No PFARs were circulated this quarter

## Strategic Objective 4: Foster a Culture of High Performance

## Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20 (6/30/20)
RAD	Documents/ Transactions Coded	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828	2,274/ 45,170,085
	Documents/Pages Processed in Paper Automation/ Conversion System	N/A	N/A	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417	1,362/ 14,789
	Documents/Pages Reviewed	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699	60,558/ 49,832,324
	Letters sent	13,433	13,253	14,796	13,763	12,562	9,538
	Telephone calls handled	11,822	12,362	11,634	13,036	13,149	9,400
	Email inquiries handled	N/A	N/A	N/A	396	658	689
	Referrals	91	43	95	46	82	28
	AF Cases RTB/FD	191/159	83/33	163/168	95/23	262/93	98/221
	Audit	<b>(b) (7)(E)</b>					
ADRO							
OAR	Cases Received	35	12	29	8	37	1
	Cases Closed (FD)	32	11	32	10	36	2



























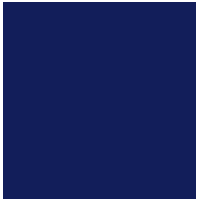












## AF Performance Goals

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Print Date: July 31, 2020

### Selected Parameters:

Office: Both

Start Date: 10/01/2019

End Date: 06/30/2020

\*Exception: YES

# AF Performance Goals

(Confidential and Sensitive)

RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	(b) (7)(E)
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**Processed**

2019	YE	H_S_P_UNAUTH	N	01/31/2020	03/26/2020	
2019	M12	P_UNAUTH	N	12/20/2019	02/12/2020	
2019	M11	P_UNAUTH	N	11/20/2019	01/13/2020	
2019	M10	P_UNAUTH	N	10/20/2019	12/04/2019	
2019	Q3	H_S_P	N	10/15/2019	12/04/2019	
2019	M9	P_UNAUTH	N	09/20/2019	11/18/2019	
2019	M8	P_UNAUTH	N	08/20/2019	10/08/2019	
2020	12P	AUTH	Y	05/21/2020	06/30/2020	
2020	M5	P_UNAUTH	N	05/20/2020	06/29/2020	
2020	12P	AUTH	Y	04/30/2020	06/16/2020	
2020	M4	P_UNAUTH	N	04/20/2020	06/12/2020	
2020	12P	AUTH	Y	04/16/2020	06/12/2020	
2020	Q1	H_S_P_UNAUTH	N	04/15/2020	06/10/2020	
2020	M3	P_UNAUTH	N	03/20/2020	04/30/2020	
2020	12P	AUTH	Y	03/05/2020	04/27/2020	
2020	12P	AUTH	Y	02/20/2020	04/13/2020	
2020	M2	P_UNAUTH	N	02/20/2020	04/06/2020	

Total AF Reports Processed 17

Average Processing Days 50.12

(b) (7)(E)

Percentage to Goal 100.00%

**Processed - No committees**

					Action Date	(b) (7)(E)
2019	M10	P_UNAUTH	Y	10/20/2019	12/05/2019	
2019	Q3	H_S_P	Y	10/15/2019	12/05/2019	
2019	30SG	AUTH	N	10/10/2019	11/18/2019	
2019	12SG	AUTH	Y	08/29/2019	10/28/2019	
2020	12C	AUTH	Y	05/18/2020	06/29/2020	
2020	12PR	AUTH	Y	05/14/2020	06/18/2020	

# AF Performance Goals

(Confidential and Sensitive)

## Processed - No committees

Action Date

(b) (7)(E)

Year	Committee	Type	Y/N	Action Date	Review Date
2020	12P	AUTH	Y	05/07/2020	06/18/2020
2020	12C	AUTH	Y	05/02/2020	06/18/2020
2020	12C	AUTH	Y	05/01/2020	06/18/2020
2020	12C	AUTH	Y	04/30/2020	06/16/2020
2020	12PR	AUTH	Y	04/30/2020	06/18/2020
2020	12SG	AUTH	Y	04/30/2020	06/18/2020
2020	12SGR	AUTH	Y	04/30/2020	06/18/2020
2020	12C	AUTH	Y	04/29/2020	06/16/2020
2020	12C	AUTH	Y	04/25/2020	06/16/2020
2020	12P	AUTH	Y	04/23/2020	06/15/2020
2020	12C	AUTH	Y	04/20/2020	06/15/2020
2020	12SG	AUTH	Y	04/16/2020	06/15/2020
2020	12C	AUTH	Y	04/13/2020	05/18/2020
2020	12C	AUTH	Y	04/06/2020	05/18/2020
2020	30SG	AUTH	N	04/02/2020	05/04/2020
2020	12C	AUTH	Y	03/23/2020	04/30/2020
2020	12PR	AUTH	Y	03/19/2020	04/28/2020
2020	12C	AUTH	Y	03/09/2020	04/28/2020
2020	12C	AUTH	Y	03/02/2020	04/27/2020
2020	12P	AUTH	Y	02/27/2020	04/14/2020
2020	12C	AUTH	Y	02/24/2020	04/14/2020
2020	12SG	AUTH	Y	02/20/2020	04/07/2020
2020	12SP	AUTH	Y	02/06/2020	03/30/2020
2020	12SP	AUTH	Y	01/23/2020	03/23/2020

Total AF Reports Processed-No Committees	30
Average Processing Days	47.43
(b) (7)(E)	
Percentage to Goal	100.00%



# AF Performance Goals

**(Confidential and Sensitive)**

Total AF Reports 47

Average Processing Days 48.40

**(b) (7)(E)**

Percentage to Goal 100.00%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters  
RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters  
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H  
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.

# AF Performance Goals

(Confidential and Sensitive)

## OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2018	48H	3730	C00665554	09/30/2019	11/21/2019	52	Y
2018	48H	3738	C00675215	10/21/2019	12/12/2019	52	Y

Total Challenges Processed 2

Average Processing Days 52.00

Total Reports Processed within 60 Days 2

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

## Administrative Fine Program Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$131,164	\$343,987	\$531,552

(b) (7)(E)



**RECEIVED**

By Office of the Commission Secretary at 10:16 am, Oct 30, 2020

**SENSITIVE**



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AGENDA DOCUMENT NO. X20-49

AGENDA ITEM

For meeting of November 10, 2020

October 30, 2020

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista Roche *KJR*  
Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Dayna C. Brown *DCB*  
Acting Assistant Staff Director  
Audit Division

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2020 Overview and 4th Quarter Highlights  
(7/1/20 – 9/30/20)

---

### **Administrative Fine Program (Office of Administrative Review)**

During the fourth quarter of FY 2020, RAD processed 10 Reason to Believe (RTB) memoranda. (b) (7)(E)

OAR processed Reviewing Officer Recommendations (RORs) for 5 cases during the fourth quarter. OAR forwarded 100% of these RORs within 60 days, thus exceeding the strategic goal of processing 75% of RORs within 60 days of the challenge receipt date. There are currently 29 Administrative Fine Program memoranda pending with the Commission.

In the fourth quarter, OAR received 19 new challenges in response to the high volume of RTB findings approved at the end of the third quarter. OAR processed RORs in 6 of these cases,


and the remaining 13 cases will be processed in first quarter of FY 2020. OAR also processed \$116,146 in Administrative Fine payments and continued to assist with financial reporting for all civil money penalties assessed by the Commission.












# Status of Compliance

FY 2020  
(10/1/2019 – 9/30/2020)





## Matters Awaiting a Commission Vote as of 10/30/20

Audit	Admin Fine Program/OAR	ADRO	Total
4	23/6	18	51

## Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20 (9/30/20)
RAD to code and enter 95% of reports within 30 days of receipt	91.5%	99.9%	95.9%	99.9%	94.1%	<b>98.5%</b>
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	91.4%	99.1%	98.7%	99.0%	99.9%	<b>99.8%</b>
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%	<b>100%</b>

## Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

## Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2020 Performance Goals	Status 9/30/20
<p>RAD staff provided extended phone coverage from 5:30pm to 8:00pm for the 2020 July Quarterly, reporting deadline.</p>	<p>The RAD mainline received and directed 55 calls between 5:30pm and 8:00pm on the July 15th deadline.</p>
<p>RAD staff collaborated with the Information Division on four (4) reporting &amp; FECfile webinars for Candidate Committees, PACs and Party Committees, and two (2) Pre-Election Communications webinars.</p>	<p>Candidate, Party/PAC reporting, Pre-Election Communications and FECfile webinars were held in September 2020.</p>
<p>RAD Assistant Staff Director provided a Best Practices for FEC Compliance session for the PLI - Corporate Political Activities 2020 Program.</p>	<p>The webinar was held in September 2020.</p>

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

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

Performance Goals	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20
RAD to review 75% of reports within 90 days of receipt	79.3%	92.9%	76.6%	92.2%	76%	91.9%
RAD to send 75% of RFAs within 40 days of report review	92%	92%	88%	88%	85%	86%
(b) (7)(E)	93.5%	100%	96.2%	96.9%	88%	100%
(b) (7)(E)	43%	56%	25%	45%	100%	N/A <sup>1</sup>
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	97%	81.8%	96.67%	100%	97%	100%
(b) (7)(E)	100%	100%	100%	99%	100%	100%

1 - No PFARs were circulated this quarter due to lack of quorum

## Strategic Objective 4: Foster a Culture of High Performance

## Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20 (9/30/20)
RAD	Documents/ Transactions Coded	56,327/ 23,957,421	53,107/ 19,385,479	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828	4,873/ 63,983,177
	Documents/Pages Processed in Paper Automation/ Conversion System	N/A	N/A	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417	1,771/ 18,028
	Documents/Pages Reviewed	82,713/ 10,575,184	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699	89,525/ 73,526,421
	Letters sent	13,433	13,253	14,796	13,763	12,562	13,838
	Telephone calls handled	11,822	12,362	11,634	13,036	13,149	13,209
	Email inquiries handled	N/A	N/A	N/A	396	658	894
	Referrals	91	43	95	46	82	34
	AF Cases RTB/FD	191/159	83/33	163/168	95/23	262/93	100/204
	Audit	<b>(b) (7)(E)</b>					
ADRO							
OAR	Cases Received	35	12	29	8	37	20
	Cases Closed (FD)	32	11	32	10	36	2

























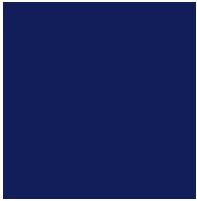












## AF Performance Goals

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Print Date: October 30, 2020

### Selected Parameters:

Office: Both

Start Date: 10/01/2019

End Date: 09/30/2020

\*Exception: YES

# AF Performance Goals

(Confidential and Sensitive)

RAD

(b) (7)(E)

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	
<b>Processed</b>						
2019	YE	H_S_P_UNAUTH	N	01/31/2020	03/26/2020	
2019	M12	P_UNAUTH	N	12/20/2019	02/12/2020	
2019	M11	P_UNAUTH	N	11/20/2019	01/13/2020	
2019	M10	P_UNAUTH	N	10/20/2019	12/04/2019	
2019	Q3	H_S_P	N	10/15/2019	12/04/2019	
2019	M9	P_UNAUTH	N	09/20/2019	11/18/2019	
2019	M8	P_UNAUTH	N	08/20/2019	10/08/2019	
2020	12P	AUTH	Y	08/06/2020	09/30/2020	
2020	12P	AUTH	Y	07/30/2020	09/22/2020	
2020	12PR	AUTH	Y	07/30/2020	09/22/2020	
2020	12P	AUTH	Y	07/23/2020	09/15/2020	
2020	M7	P_UNAUTH	N	07/20/2020	09/15/2020	
2020	Q2	H_S_P_UNAUTH	N	07/15/2020	09/10/2020	
2020	M6	P_UNAUTH	N	06/20/2020	08/18/2020	
2020	12P	AUTH	Y	06/18/2020	08/11/2020	
2020	12P	AUTH	Y	06/11/2020	08/10/2020	
2020	30SG	AUTH	N	06/11/2020	08/10/2020	
2020	12P	AUTH	Y	05/21/2020	06/30/2020	
2020	M5	P_UNAUTH	N	05/20/2020	06/29/2020	
2020	12P	AUTH	Y	04/30/2020	06/16/2020	
2020	M4	P_UNAUTH	N	04/20/2020	06/12/2020	
2020	12P	AUTH	Y	04/16/2020	06/12/2020	
2020	Q1	H_S_P_UNAUTH	N	04/15/2020	06/10/2020	
2020	M3	P_UNAUTH	N	03/20/2020	04/30/2020	
2020	12P	AUTH	Y	03/05/2020	04/27/2020	
2020	12P	AUTH	Y	02/20/2020	04/13/2020	
2020	M2	P_UNAUTH	N	02/20/2020	04/06/2020	

# AF Performance Goals

(Confidential and Sensitive)

Total AF Reports Processed 27  
 Average Processing Days 52.44

(b) (7)(E)

Percentage to Goal 100.00%

## Processed - No committees

Action Date

(b) (7)(E)

Year	Committee	Auth	Y/N	Start Date	Action Date
2019	M10	P_UNAUTH	Y	10/20/2019	12/05/2019
2019	Q3	H_S_P	Y	10/15/2019	12/05/2019
2019	30SG	AUTH	N	10/10/2019	11/18/2019
2019	12SG	AUTH	Y	08/29/2019	10/28/2019
2020	12P	AUTH	Y	08/17/2020	09/30/2020
2020	12PR	AUTH	Y	08/13/2020	09/30/2020
2020	12P	AUTH	Y	07/28/2020	09/22/2020
2020	12C	AUTH	Y	07/27/2020	09/22/2020
2020	12P	AUTH	Y	07/27/2020	09/22/2020
2020	12P	AUTH	Y	07/25/2020	09/16/2020
2020	30SG	AUTH	N	07/23/2020	09/15/2020
2020	12C	AUTH	Y	07/20/2020	09/15/2020
2020	12P	AUTH	Y	07/20/2020	09/15/2020
2020	12C	AUTH	Y	07/13/2020	09/09/2020
2020	12P	AUTH	Y	07/12/2020	09/09/2020
2020	12C	AUTH	Y	07/06/2020	09/04/2020
2020	12P	AUTH	Y	07/02/2020	08/18/2020
2020	12PR	AUTH	Y	07/02/2020	08/18/2020
2020	12P	AUTH	Y	06/25/2020	08/18/2020
2020	12C	AUTH	Y	06/24/2020	08/18/2020
2020	12C	AUTH	Y	06/15/2020	08/11/2020
2020	12PR	AUTH	Y	06/11/2020	08/10/2020
2020	12SG	AUTH	Y	06/11/2020	08/10/2020
2020	30SGR	AUTH	N	06/11/2020	08/10/2020
2020	12C	AUTH	Y	06/08/2020	08/07/2020
2020	12C	AUTH	Y	06/01/2020	07/30/2020
2020	12P	AUTH	Y	05/28/2020	07/08/2020
2020	30SG	AUTH	N	05/28/2020	07/08/2020
2020	12C	AUTH	Y	05/25/2020	07/08/2020
2020	12C	AUTH	Y	05/18/2020	06/29/2020
2020	12PR	AUTH	Y	05/14/2020	06/18/2020

# AF Performance Goals

(Confidential and Sensitive)

## Processed - No committees

Action Date

(b) (7)(E)

Year	Code	Type	Status	Action Date	Completion Date
2020	12P	AUTH	Y	05/07/2020	06/18/2020
2020	12C	AUTH	Y	05/02/2020	06/18/2020
2020	12C	AUTH	Y	05/01/2020	06/18/2020
2020	12C	AUTH	Y	04/30/2020	06/16/2020
2020	12PR	AUTH	Y	04/30/2020	06/18/2020
2020	12SG	AUTH	Y	04/30/2020	06/18/2020
2020	12SGR	AUTH	Y	04/30/2020	06/18/2020
2020	12C	AUTH	Y	04/29/2020	06/16/2020
2020	12C	AUTH	Y	04/25/2020	06/16/2020
2020	12P	AUTH	Y	04/23/2020	06/15/2020
2020	12C	AUTH	Y	04/20/2020	06/15/2020
2020	12SG	AUTH	Y	04/16/2020	06/15/2020
2020	12C	AUTH	Y	04/13/2020	05/18/2020
2020	12C	AUTH	Y	04/06/2020	05/18/2020
2020	30SG	AUTH	N	04/02/2020	05/04/2020
2020	12C	AUTH	Y	03/23/2020	04/30/2020
2020	12PR	AUTH	Y	03/19/2020	04/28/2020
2020	12C	AUTH	Y	03/09/2020	04/28/2020
2020	12C	AUTH	Y	03/02/2020	04/27/2020
2020	12P	AUTH	Y	02/27/2020	04/14/2020
2020	12C	AUTH	Y	02/24/2020	04/14/2020
2020	12SG	AUTH	Y	02/20/2020	04/07/2020
2020	12SP	AUTH	Y	02/06/2020	03/30/2020
2020	12SP	AUTH	Y	01/23/2020	03/23/2020

Total AF Reports Processed-No Committees	55
Average Processing Days	50.33
(b) (7)(E)	
Percentage to Goal	100.00%





# AF Performance Goals

**(Confidential and Sensitive)**

Total AF Reports 82

Average Processing Days 51.02

**(b) (7)(E)**

Percentage to Goal 100.00%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters  
RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters  
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H  
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.

# AF Performance Goals

(Confidential and Sensitive)

## OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2018	48H	3730	C00665554	09/30/2019	11/21/2019	52	Y
2018	48H	3738	C00675215	10/21/2019	12/12/2019	52	Y
2020	M2	3783	C00406645	08/07/2020	09/28/2020	52	Y
2020	M3	3799	C00406645	08/07/2020	09/28/2020	52	Y
2020	Q1	3808	C00002832	08/05/2020	09/14/2020	40	Y
2020	Q1	3830	C00002840	08/05/2020	09/14/2020	40	Y
2020	Q1	3832	C00578187	07/15/2020	08/13/2020	29	Y
2020	M5	3844	C00406645	08/07/2020	09/28/2020	52	Y

Total Challenges Processed 8

Average Processing Days 46.13

Total Reports Processed within 60 Days 8

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

## Administrative Fine Program Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$131,164	\$318,495	\$530,868

(b) (7)(E)

**RECEIVED**

By Office of the Commission Secretary at 11:54 am, Jan 29, 2021



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

January 29, 2021

**MEMORANDUM**

AGENDA DOCUMENT NO. X21-06  
AGENDA ITEM  
For the meeting of February 9, 2021

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista Roche *KJR*  
Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Dayna C. Brown *DCB*  
Acting Assistant Staff Director  
Audit Division

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2021 – 1<sup>st</sup> Quarter Highlights (10/1/20 – 12/31/20)

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**Administrative Fine Program (Office of Administrative Review)**

During the first quarter of FY 2021, RAD processed 9 Reason to Believe (RTB) and 22 Final Determination (FD) recommendation memoranda. (b) (7)(E)

OAR processed Reviewing Officer Recommendations (RORs) for 13 cases during the first quarter, completing its review of challenges received in FY 2020. OAR forwarded 100% of these RORs within 60 days, thus exceeding the strategic goal of processing 75% of RORs within 60 days of the challenge receipt date. OAR also processed 12 FD recommendation memoranda during the first quarter. There are currently 19 Administrative Fine Program memoranda pending with the Commission.

OAR processed \$59,582 in Administrative Fine payments during the first quarter of FY 2021 and continued to assist with financial reporting for all civil money penalties assessed by the Commission. OAR also collaborated with OCIO to make corrections and enhancements to the OGC and ADRO financial reports to increase efficiency in monthly reporting. OAR is expecting the Commission will receive a high volume of Administrative Fine challenges and payments in the second quarter in response to the mass approval of RTB findings in January 2021.















# Status of Compliance

FY 2021  
(10/1/2020 – 12/31/2020)



## Matters Awaiting a Commission Vote as of 1/29/2021

Audit	Admin Fine Program/OAR	ADRO	Total
2	5/14	12	33

## Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (12/31/20)
RAD to code and enter 95% of reports within 30 days of receipt	99.9%	95.9%	99.9%	94.1%	98.5%	<b>79.2%</b>
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	99.1%	98.7%	99.0%	99.9%	99.8%	<b>99.9%</b>
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%	<b>100%</b>

## Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

## Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2020 Performance Goals	Status 12/31/20
<p>RAD staff provided extended phone coverage from 5:30pm to 8:00pm for the 2020 October Quarterly and 30 Day Post-Generals reporting deadline.</p>	<p>The RAD mainline received and directed 41 calls between 5:30pm and 8:00pm on the October 15<sup>th</sup> and December 3<sup>rd</sup> deadlines.</p>
<p>RAD staff collaborated with the Information Division on a Winding Down the Campaign webinar for Authorized Committees.</p>	<p>The Winding Down the Campaign webinar was held in November 2020.</p>
<p>RAD Assistant Staff Director served as a panelist at the virtual 2020 NABPAC Post-Election Conference.</p>	<p>The conference was held in December 2020.</p>

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

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

Performance Goals	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21
RAD to review 75% of reports within 90 days of receipt	92.9%	76.6%	92.2%	76%	91.9%	<b>97%</b>
RAD to send 75% of RFAs within 40 days of report review	92%	88%	88%	85%	86%	<b>91%</b>
<b>(b) (7)(E)</b>	100%	96.2%	96.9%	88%	100%	<b>100%</b>
	56%	25%	45%	100%	N/A	N/A
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	81.8%	96.67%	100%	97%	100%	<b>100%</b>
<b>(b) (7)(E)</b>	100%	100%	99%	100%	100%	<b>100%</b>

1 - No PFARs were circulated this quarter.

## Strategic Objective 4: Foster a Culture of High Performance

## Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (12/31/20)
RAD	Documents/ Transactions Coded	53,107/ 19,385,479	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828	4,873/ 63,983,177	1,827/ 63,428,038
	Documents/Pages Processed in Paper Automation/ Conversion System	N/A	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417	1,771/ 18,028	109/ 1,451
	Documents/Pages Reviewed	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699	89,525/ 73,526,421	31,042/ 59,283,494
	Letters sent	13,253	14,796	13,763	12,562	13,838	5,021
	Telephone calls handled	12,362	11,634	13,036	13,149	13,209	4,545
	Email inquiries handled	N/A	N/A	396	658	894	288
	Referrals	43	95	46	82	34	11
	AF Cases RTB/FD	83/33	163/168	95/23	262/93	100/204	0/0
	Audit	<b>(b) (7)(E)</b>					
ADRO							
OAR	Cases Received	12	29	8	37	20	1
	Cases Closed (FD)	11	32	10	36	2	0



















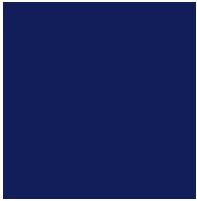












## AF Performance Goals

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Print Date: January 29, 2021

### Selected Parameters:

Office: Both

Start Date: 10/01/2020

End Date: 12/31/2020

\*Exception: YES

# AF Performance Goals

(Confidential and Sensitive)

## RAD

(b) (7)(E)

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date	
<b>Processed</b>						
2020	12G	AUTH	Y	10/22/2020	12/14/2020	
2020	12G	UNAUTH_M	Y	10/22/2020	12/14/2020	
2020	M10	P_UNAUTH	N	10/20/2020	12/10/2020	
2020	M10	P_UNAUTH	Y	10/20/2020	12/10/2020	
2020	Q3	H_S_P_UNAUTH	N	10/15/2020	12/10/2020	
2020	Q3	H_S_P_UNAUTH	Y	10/15/2020	12/03/2020	
2020	M9	P_UNAUTH	N	09/20/2020	11/16/2020	
2020	12P	AUTH	Y	08/27/2020	10/13/2020	
2020	M8	P_UNAUTH	N	08/20/2020	10/13/2020	

Total AF Reports Processed 9

Average Processing Days 52.33

(b) (7)(E)

Percentage to Goal 100.00%

### Processed - No committees

Action Date

(b) (7)(E)

2020	12SGR	AUTH	Y	11/19/2020	12/22/2020	
2020	12GR	AUTH	Y	11/05/2020	12/14/2020	
2020	30SG	AUTH	N	10/29/2020	12/14/2020	
2020	12SG	AUTH	Y	10/22/2020	12/10/2020	
2020	12SG	AUTH	Y	09/17/2020	10/20/2020	
2020	12P	AUTH	Y	09/03/2020	10/13/2020	
2020	12P	AUTH	Y	08/20/2020	10/13/2020	

# AF Performance Goals

(Confidential and Sensitive)

Total AF Reports Processed-No Committees	7
Average Processing Days	42.00
(b) (7)(E)	
Percentage to Goal	100.00%

Total AF Reports	16
Average Processing Days	47.81
(b) (7)(E)	
Percentage to Goal	100.00%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters  
RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters  
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H  
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.

# AF Performance Goals

(Confidential and Sensitive)

## OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2019	MY	3748	C00634964	08/07/2020	10/06/2020	60	Y
2019	M8	3749	C00008409	09/24/2020	11/23/2020	60	Y
2019	Q3	3758	C00615013	09/08/2020	11/06/2020	59	Y
2019	YE	3776	C00634964	08/07/2020	10/06/2020	60	Y
2019	YE	3778	C00615013	09/08/2020	11/06/2020	59	Y
2019	YE	3780	C00426569	08/25/2020	10/23/2020	59	Y
2020	12P	3789	C00676320	08/20/2020	10/19/2020	60	Y
2020	Q1	3816	C00691709	09/17/2020	11/13/2020	57	Y
2020	Q1	3823	C00634964	08/07/2020	10/06/2020	60	Y
2020	Q1	3826	C00615013	09/08/2020	11/06/2020	59	Y
2020	Q1	3827	C00638148	08/08/2020	10/07/2020	60	Y
2020	Q1	3831	C00676320	08/20/2020	10/19/2020	60	Y
2020	12P	3834	C00154625	08/17/2020	10/16/2020	60	Y

Total Challenges Processed 13

Average Processing Days 59.46

Total Reports Processed within 60 Days 13

Percentage to Goal 100.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters



## Administrative Fine Program Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (12/31/20)
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$131,164	\$318,495	\$530,868	\$0

**(b) (7)(E)**

**RECEIVED**

By Office of the Commission Secretary at 11:09 am, Apr 30, 2021



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

April 30, 2021

**MEMORANDUM**

**AGENDA DOCUMENT NO.** X21-16

**AGENDA ITEM**

**For the meeting of** May 4, 2021

**SUBMITTED LATE**

**TO:** The Commission

**THROUGH:** Alec Palmer *AP*  
Staff Director

**FROM:** Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista Roche *KJR*  
Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Dayna C. Brown *PCO for DCB*  
Acting Assistant Staff Director  
Audit Division

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

**SUBJECT:** Status of Compliance – Fiscal Year 2021 – 2<sup>nd</sup> Quarter Highlights (1/1/21 – 3/31/21)

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### **Administrative Fine Program (Office of Administrative Review)**

During the second quarter of FY 2021, the Commission processed 244 Reason to Believe (RTB) findings. OAR received challenges in 20 cases and processed 2 Reviewing Officer Recommendations (RORs). The Commission reviewed final determination recommendations in 93 cases, made a final determination that the respondents in 90 cases violated 52 U.S.C. § 30104(a), and assessed \$320,902 in civil penalties. The Commission also collected \$62,590 in fine payments and prepared 86 cases for public release.

(b) (7)(E)

Additionally, OAR forwarded 100% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

In the second quarter, the Reviewing Officer collaborated with OGC and ADRO to provide responsive materials to a FOIA request related to unpaid civil money penalties. OAR also began to collaborate with OCIO to develop a new Administrative Fines search system for the website. This new search system will eventually replace the current Administrative Fines search within the Enforcement Query System.















# Status of Compliance

FY 2021  
(10/1/2020 – 3/31/2021)



## Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (3/31/21)
RAD to code and enter 95% of reports within 30 days of receipt	99.9%	95.9%	99.9%	94.1%	98.5%	<b>85.5%</b>
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	99.1%	98.7%	99.0%	99.9%	99.8%	<b>99.9%</b>
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%	<b>100%</b>

## Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

## Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2020 Performance Goals	Status 3/31/21
<p>RAD staff provided extended phone coverage from 5:30pm to 8:00pm for the 2020 Year End reporting deadline.</p>	<p>The RAD mainline received and directed 6 calls between 5:30pm and 8:00pm for the 2021 Year End filing deadline and handled a total of 139 calls.</p>
<p>RAD staff collaborated with the Information Division on the following webinars: Candidate Committee, Party/PAC, Corporate PAC, Member/Labor PAC and FECfile.</p>	<p>The Candidate Committee, Party/PAC and FECfile webinars were held in January 2021, the Corporate PAC and Member/Labor PAC webinars were held in March 2021.</p>
<p>RAD staff collaborated with the Information Division on 4 Record Articles and 1 Tip for Treasurers.</p>	<p>Record Articles were published in January and March 2021 covering Reports Due in 2021, the Louisiana Special elections, the Texas-06 Special election and the April 2021 Reporting Reminder. The Tip for Treasurers addressed Candidate registration when the district is uncertain and was published in April 2021.</p>

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

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

Performance Goals	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21
RAD to review 75% of reports within 90 days of receipt	92.9%	76.6%	92.2%	76%	91.9%	89%
RAD to send 75% of RFAs within 40 days of report review	92%	88%	88%	85%	86%	92%
(b) (7) (E)	100%	96.2%	96.9%	88%	100%	93%
(b) (7) (E)	56%	25%	45%	100%	N/A	80%
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	81.8%	96.67%	100%	97%	100%	100%
(b) (7) (E)	100%	100%	99%	100%	100%	100%

1 - No PFARs were circulated this quarter.

## Strategic Objective 4: Foster a Culture of High Performance

## Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (3/31/21)
RAD	Documents/ Transactions Coded	53,107/ 19,385,479	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828	4,873/ 63,983,177	3,099/ 117,256,316
	Documents/Pages Processed in Paper Automation/ Conversion System	N/A	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417	1,771/ 18,028	1,083/ 9,906
	Documents/Pages Reviewed	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699	89,525/ 73,526,421	64,366/ 161,670,101
	Letters sent	13,253	14,796	13,763	12,562	13,838	10,195
	Telephone calls handled	12,362	11,634	13,036	13,149	13,209	7,950
	Email inquiries handled	N/A	N/A	396	658	894	521
	Referrals	43	95	46	82	34	36
	AF Cases RTB/FD	83/33	163/168	95/23	262/93	100/204	244/78
	Audit	<b>(b) (7)(E)</b>					
ADRO							
OAR	Cases Received	12	29	8	37	20	20
	Cases Closed (FD)	11	32	10	36	2	14

























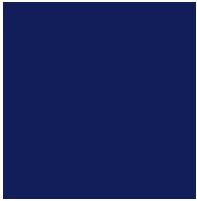












## AF Performance Goals

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Print Date: April 30, 2021

### Selected Parameters:

Office: Both

Start Date: 10/01/2020

End Date: 03/31/2021

\*Exception: YES

# AF Performance Goals

(Confidential and Sensitive)

RAD

(b) (7)(E)

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date
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**Processed**

2020	YE	H_S_P_UNAUTH	N	01/31/2021	03/31/2021
2020	M12	P_UNAUTH	N	12/20/2020	02/17/2021
2020	30G	UNAUTH	N	12/03/2020	03/17/2021
2020	30G	AUTH	N	12/03/2020	01/22/2021
2020	M11	P_UNAUTH	N	11/20/2020	01/19/2021
2020	12G	UNAUTH_Q	Y	10/22/2020	03/02/2021
2020	12G	AUTH	Y	10/22/2020	12/14/2020
2020	12G	UNAUTH_M	Y	10/22/2020	12/14/2020
2020	M10	P_UNAUTH	N	10/20/2020	12/10/2020
2020	M10	P_UNAUTH	Y	10/20/2020	12/10/2020
2020	Q3	H_S_P_UNAUTH	N	10/15/2020	12/10/2020
2020	Q3	H_S_P_UNAUTH	Y	10/15/2020	12/03/2020
2020	M9	P_UNAUTH	N	09/20/2020	11/16/2020
2020	12P	AUTH	Y	08/27/2020	10/13/2020
2020	M8	P_UNAUTH	N	08/20/2020	10/13/2020

Total AF Reports Processed 15

Average Processing Days 62.27

(b) (7)(E)

Percentage to Goal 86.67%

**Processed - No committees**

Action Date

2020	30GR	AUTH	N	01/04/2021	02/17/2021
2020	30SGR	AUTH	N	12/31/2020	02/17/2021
2020	30GR	AUTH	N	12/17/2020	02/12/2021
2020	30SG	AUTH	N	12/03/2020	01/22/2021
2020	12GR	AUTH	Y	11/23/2020	01/19/2021
2020	12SGR	AUTH	Y	11/19/2020	12/22/2020
2020	12GR	AUTH	Y	11/05/2020	12/14/2020
2020	30SG	AUTH	N	10/29/2020	12/14/2020

(b) (7)(E)

# AF Performance Goals

(Confidential and Sensitive)

## Processed - No committees

					Action Date	(b) (7)(E)
2020	12SG	AUTH	Y	10/22/2020	12/10/2020	
2020	12SG	AUTH	Y	09/17/2020	10/20/2020	
2020	12P	AUTH	Y	09/03/2020	10/13/2020	
2020	12P	AUTH	Y	08/20/2020	10/13/2020	
2021	12GR	AUTH	Y	12/24/2020	02/17/2021	
2021	12SGR	AUTH	Y	12/24/2020	02/17/2021	

Total AF Reports Processed-No Committees	14
Average Processing Days	47.14
(b) (7)(E)	
Percentage to Goal	100.00%

Total AF Reports	29
Average Processing Days	54.97
(b) (7)(E)	
Percentage to Goal	93.10%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters  
 RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters  
 processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H  
 sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.

# AF Performance Goals

(Confidential and Sensitive)

## OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2019	MY	3748	C00634964	08/07/2020	10/06/2020	60	Y
2019	M8	3749	C00008409	09/24/2020	11/23/2020	60	Y
2019	Q3	3758	C00615013	09/08/2020	11/06/2020	59	Y
2019	YE	3776	C00634964	08/07/2020	10/06/2020	60	Y
2019	YE	3778	C00615013	09/08/2020	11/06/2020	59	Y
2019	YE	3780	C00426569	08/25/2020	10/23/2020	59	Y
2020	12P	3789	C00676320	08/20/2020	10/19/2020	60	Y
2020	Q1	3816	C00691709	09/17/2020	11/13/2020	57	Y
2020	Q1	3823	C00634964	08/07/2020	10/06/2020	60	Y
2020	Q1	3826	C00615013	09/08/2020	11/06/2020	59	Y
2020	Q1	3827	C00638148	08/08/2020	10/07/2020	60	Y
2020	Q1	3829	C00725994	11/05/2020	01/04/2021	60	Y
2020	Q1	3831	C00676320	08/20/2020	10/19/2020	60	Y
2020	12P	3834	C00154625	08/17/2020	10/16/2020	60	Y
2020	Q2	3904	C00676320	02/10/2021	03/31/2021	49	Y

Total Challenges Processed 15

Average Processing Days 58.80

Total Reports Processed within 60 Days 15

Percentage to Goal 100.00%





# AF Performance Goals

**(Confidential and Sensitive)**

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

## Administrative Fine Program Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (3/31/21)
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$131,164	\$318,495	\$522,874	\$320,902

**(b) (7)(E)**



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

AGENDA DOCUMENT NO. X21-24  
AGENDA ITEM  
For meeting of August 10, 2021

July 30, 2021

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista J. Roche *KJR*  
Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Dayna C. Brown *DCB*  
Assistant Staff Director  
Audit Division

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2021 – 3<sup>rd</sup> Quarter Highlights (4/1/21 – 6/30/21)

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### **Administrative Fine Program (Office of Administrative Review)**

During the third quarter of FY 2021, the Commission processed 114 Reason to Believe (RTB) findings. OAR received challenges in 11 cases and processed 23 Reviewing Officer Recommendations (RORs). The Commission reviewed final determination recommendations in 40 cases, made a final determination that the respondents in 38 cases violated

52 U.S.C. § 30104(a), and assessed \$130,084 in civil penalties. The Commission also collected \$114,820 in fine payments and prepared 39 cases for public release.

(b) (7)(E)

Additionally, OAR forwarded 95.6% of RORs within 60 days of receipt of each challenge, thus exceeding its strategic goal of processing 75% of RORs within 60 days (Appendix E).

In the third quarter, the Reviewing Officer also continued to work with OCIO to develop and test the new Administrative Fines search system for the website. This new search feature will go live in August 2021 and replace the current Administrative Fines search within the Enforcement Query System.















# Status of Compliance

FY 2021  
(10/1/2020 – 6/30/2021)



## Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (6/30/21)
RAD to code and enter 95% of reports within 30 days of receipt	99.9%	95.9%	99.9%	94.1%	98.5%	<b>87.1%</b>
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	99.1%	98.7%	99.0%	99.9%	99.8%	<b>99.9%</b>
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%	<b>100%</b>

## Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

## Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2020 Performance Goals	Status 6/30/21
<p>RAD staff provided extended phone coverage from 5:30pm to 8:00pm for the 2021 April Quarterly reporting deadline.</p>	<p>RAD staff handled 15 calls between 5:30pm and 8:00pm for the 2021 April Quarterly filing deadline and handled a total of 133 calls.</p>
<p>RAD staff collaborated with the Information Division on the following webinars: Candidate Committee (2), Party Committee, Trade PAC, and FECfile.</p>	<p>Candidate Committee and Trade PAC webinars were held in April 2021, Party Committee, Candidate Committee and FECfile webinars were held in June 2021.</p>
<p>RAD implemented the RAD Education Program for the 2020 cycle to provide an informal, education-based means for resolving compliance issues, in lieu of an audit in some cases. Eligible committees have an opportunity to participate in tailored training focused on the issues identified during the review of the committees' reports.</p>	<p>RAD staff identified 14 committees (4 Candidate Committees, 6 PACs, 4 Party Committees) thus far as eligible to participate in the RAD Education Program. All 14 Committees agreed to participate. Training sessions were held for all 4 Candidate Committees and are in the process of being scheduled for the PACs and Party Committees.</p>

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

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

Performance Goals	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21
RAD to review 75% of reports within 90 days of receipt	92.9%	76.6%	92.2%	76%	91.9%	<b>86.2%</b>
RAD to send 75% of RFAs within 40 days of report review	92%	88%	88%	85%	86%	<b>92%</b>
(b) (7) (E)	100%	96.2%	96.9%	88%	100%	<b>95.2%</b>
(b) (7) (E)	56%	25%	45%	100%	N/A	<b>83%</b>
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	81.8%	96.67%	100%	97%	100%	<b>97%</b>
(b) (7) (E)	100%	100%	99%	100%	100%	<b>100%</b>

1 - No PFARs were circulated this quarter.

## Strategic Objective 4: Foster a Culture of High Performance

## Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (6/30/21)
RAD	Documents/ Transactions Coded	53,107/ 19,385,479	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828	4,873/ 63,983,177	3,715/ 123,987,343
	Documents/Pages Processed in Paper Automation/ Conversion System	N/A	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417	1,771/ 18,028	2,563/ 24,323
	Documents/Pages Reviewed	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699	89,525/ 73,526,421	82,337/ 173,740,513
	Letters sent	13,253	14,796	13,763	12,562	13,838	12,319
	Telephone calls handled	12,362	11,634	13,036	13,149	13,209	10,671
	Email inquiries handled	N/A	N/A	396	658	894	716
	Referrals	43	95	46	82	34	69
	AF Cases RTB/FD	83/33	163/168	95/23	262/93	100/204	358/99
	Audit	<b>(b) (7)(E)</b>					
ADRO							
OAR	Cases Received	12	29	8	37	20	31
	Cases Closed (FD)	11	32	10	36	2	32

























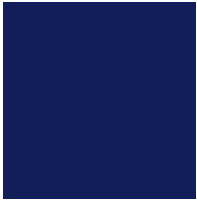












## AF Performance Goals

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Print Date: July 29, 2021

### Selected Parameters:

Office: Both

Start Date: 10/01/2020

End Date: 06/30/2021

\*Exception: YES

# AF Performance Goals

(Confidential and Sensitive)

RAD

(b) (7)(E)

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date
<b>Processed</b>					
2020	YE	H_S_P_UNAUTH	N	01/31/2021	03/31/2021
2020	M12	P_UNAUTH	N	12/20/2020	02/17/2021
2020	30G	UNAUTH	N	12/03/2020	03/17/2021
2020	30G	AUTH	N	12/03/2020	01/22/2021
2020	M11	P_UNAUTH	N	11/20/2020	01/19/2021
2020	12G	UNAUTH_Q	Y	10/22/2020	03/02/2021
2020	12G	AUTH	Y	10/22/2020	12/14/2020
2020	12G	UNAUTH_M	Y	10/22/2020	12/14/2020
2020	M10	P_UNAUTH	N	10/20/2020	12/10/2020
2020	M10	P_UNAUTH	Y	10/20/2020	12/10/2020
2020	Q3	H_S_P_UNAUTH	N	10/15/2020	12/10/2020
2020	Q3	H_S_P_UNAUTH	Y	10/15/2020	12/03/2020
2020	M9	P_UNAUTH	N	09/20/2020	11/16/2020
2020	12P	AUTH	Y	08/27/2020	10/13/2020
2020	M8	P_UNAUTH	N	08/20/2020	10/13/2020
2021	M5	P_UNAUTH	N	05/20/2021	06/30/2021
2021	Q1	H_S_P	N	04/15/2021	06/02/2021
2021	M2	P_UNAUTH	N	02/20/2021	04/12/2021

Total AF Reports Processed 18

Average Processing Days 59.67

(b) (7)(E)

Percentage to Goal 88.89%

**Processed - No committees**

Action Date

(b) (7)(E)

2020	30GR	AUTH	N	01/04/2021	02/17/2021
2020	30SGR	AUTH	N	12/31/2020	02/17/2021
2020	30GR	AUTH	N	12/17/2020	02/12/2021
2020	30SG	AUTH	N	12/03/2020	01/22/2021
2020	12GR	AUTH	Y	11/23/2020	01/19/2021

# AF Performance Goals

(Confidential and Sensitive)

## Processed - No committees

Action Date

(b) (7)(E)

Year	Report Type	Auth Type	Y/N	Start Date	Action Date	
2020	12SGR	AUTH	Y	11/19/2020	12/22/2020	
2020	12GR	AUTH	Y	11/05/2020	12/14/2020	
2020	30SG	AUTH	N	10/29/2020	12/14/2020	
2020	12SG	AUTH	Y	10/22/2020	12/10/2020	
2020	12SG	AUTH	Y	09/17/2020	10/20/2020	
2020	12P	AUTH	Y	09/03/2020	10/13/2020	
2020	12P	AUTH	Y	08/20/2020	10/13/2020	
2021	30SGR	AUTH	N	05/24/2021	06/30/2021	
2021	12SG	AUTH	Y	05/20/2021	06/24/2021	
2021	M4	P_UNAUTH	N	04/20/2021	06/03/2021	
2021	12SG	AUTH	Y	04/19/2021	06/03/2021	
2021	30SG	AUTH	N	04/19/2021	06/02/2021	
2021	12SGR	AUTH	Y	04/12/2021	06/01/2021	
2021	M3	P_UNAUTH	N	03/20/2021	04/29/2021	
2021	12SG	AUTH	Y	03/08/2021	04/14/2021	
2021	30GR	AUTH	N	02/04/2021	04/01/2021	
2021	30SGR	AUTH	N	02/04/2021	04/01/2021	
2021	12GR	AUTH	Y	12/24/2020	02/17/2021	
2021	12SGR	AUTH	Y	12/24/2020	02/17/2021	

Total AF Reports Processed-No Committees 24  
 Average Processing Days 46.00  
 (b) (7)(E)  
 Percentage to Goal 100.00%

Total AF Reports 42  
 Average Processing Days 51.86  
 (b) (7)(E)  
 Percentage to Goal 95.24%





# AF Performance Goals

**(Confidential and Sensitive)**

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters

RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters  
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H  
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.

# AF Performance Goals

(Confidential and Sensitive)

## OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2019	MY	3748	C00634964	08/07/2020	10/06/2020	60	Y
2019	M8	3749	C00008409	09/24/2020	11/23/2020	60	Y
2019	Q3	3758	C00615013	09/08/2020	11/06/2020	59	Y
2019	YE	3776	C00634964	08/07/2020	10/06/2020	60	Y
2019	YE	3778	C00615013	09/08/2020	11/06/2020	59	Y
2019	YE	3780	C00426569	08/25/2020	10/23/2020	59	Y
2020	12P	3789	C00676320	08/20/2020	10/19/2020	60	Y
2020	Q1	3816	C00691709	09/17/2020	11/13/2020	57	Y
2020	Q1	3823	C00634964	08/07/2020	10/06/2020	60	Y
2020	Q1	3826	C00615013	09/08/2020	11/06/2020	59	Y
2020	Q1	3827	C00638148	08/08/2020	10/07/2020	60	Y
2020	Q1	3829	C00725994	11/05/2020	01/04/2021	60	Y
2020	Q1	3831	C00676320	08/20/2020	10/19/2020	60	Y
2020	12P	3834	C00154625	08/17/2020	10/16/2020	60	Y
2020	30SG	3848	C00718635	02/11/2021	04/01/2021	49	Y
2020	M6	3853	C00702324	02/16/2021	04/01/2021	44	Y
2020	Q2	3867	C00656033	04/29/2021	06/24/2021	56	Y
2020	Q2	3878	C00710608	02/17/2021	04/16/2021	58	Y
2020	Q2	3883	C00104455	03/18/2021	05/17/2021	60	Y
2020	Q2	3904	C00676320	02/10/2021	03/31/2021	49	Y
2020	M7	3908	C00702324	02/16/2021	04/01/2021	44	Y
2020	12P	3912	C00656033	04/29/2021	06/24/2021	56	Y
2020	12PR	3916	C00741397	03/09/2021	05/07/2021	59	Y
2020	M8	3919	C00702324	02/16/2021	04/01/2021	44	Y

# AF Performance Goals

(Confidential and Sensitive)

2020	M9	3927	C00702324	02/16/2021	04/01/2021	44	Y
2020	Q3	3938	C00743146	02/17/2021	06/25/2021	128	N
2020	Q3	3941	C00710608	02/17/2021	04/16/2021	58	Y
2020	Q3	3944	C00303032	03/23/2021	05/21/2021	59	Y
2020	Q3	3955	C00708941	02/17/2021	04/15/2021	57	Y
2020	Q3	3957	C00656033	04/29/2021	06/24/2021	56	Y
2020	Q3	3962	C00735910	03/26/2021	05/20/2021	55	Y
2020	Q3	3971	C00715748	03/08/2021	05/07/2021	60	Y
2020	M10	4011	C00702324	02/16/2021	04/01/2021	44	Y
2020	12G	4015	C00702324	02/16/2021	04/01/2021	44	Y
2020	30G	4075	C00743146	04/27/2021	06/25/2021	59	Y
2020	30G	4086	C00556605	04/16/2021	06/15/2021	60	Y
2020	YE	4131	C00743146	04/27/2021	06/25/2021	59	Y
2020	YE	4181	C00103861	04/27/2021	06/21/2021	55	Y

Total Challenges Processed 38

Average Processing Days 57.63

Total Reports Processed within 60 Days 37

Percentage to Goal 97.37%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

## Administrative Fine Program Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 6/30/21)
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$131,164	\$318,495	\$522,874	\$450,986

**(b) (7)(E)**



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

AGENDA DOCUMENT NO. X21-34  
AGENDA ITEM  
For meeting of November 9, 2021

October 29, 2021

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista Roche *KJR*  
Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Dayna C. Brown *DCB*  
Assistant Staff Director  
Audit Division

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2021 – 4<sup>th</sup> Quarter Highlights (7/1/21 – 9/30/21)

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### **Administrative Fine Program (Office of Administrative Review)**

During the fourth quarter of FY 2021, the Commission processed 25 Reason to Believe (RTB) findings. OAR received challenges in 3 cases and processed 6 Reviewing Officer Recommendations (RORs). The Commission reviewed final determination recommendations in 168 cases, made a final determination that the respondents in 163 cases violated 52 U.S.C. § 30104(a), and assessed \$498,833 in civil penalties. The Commission also collected \$88,226 in fine payments and prepared 78 cases for public release.

(b) (7)(E)

OAR forwarded 50% of RORs within 60 days of receipt of each challenge, not meeting its strategic goal of processing 75% of RORs within 60 days (Appendix E).

In the fourth quarter, the Reviewing Officer and RAD worked with OCIO to launch the new Administrative Fines search system for the website. This new search feature includes capabilities to search closed matters by case number, committee name, and keywords. Case summaries include a new payment status, and the disposition overview now clearly indicates matters that have been challenged or transferred to Department of the Treasury for collection.















# Status of Compliance

FY 2021  
(10/1/2020 – 9/30/2021)



## Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (9/30/21)
RAD to code and enter 95% of reports within 30 days of receipt	99.9%	95.9%	99.9%	94.1%	98.5%	<b>89.3%</b>
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	99.1%	98.7%	99.0%	99.9%	99.8%	<b>99.9%</b>
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%	<b>100%</b>

## Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

## Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2020 Performance Goals	Status 9/30/21
<p>RAD staff provided extended phone coverage from 5:30pm to 8:00pm for the 2021 July Quarterly and Mid-Year reporting deadlines.</p>	<p>RAD staff handled 14 calls for the 2021 July Quarterly and 5 calls for the 2021 Mid-Year filing deadlines between 5:30pm and 8:00pm. 142 total calls were handled on the July Quarterly filing deadline and 72 total calls on the Mid-Year filing deadline.</p>
<p>RAD staff collaborated with the Information Division on the FEC Virtual Conference for Candidates, PACs and Party Committees, as well as the following webinars: Candidate Committee, Party/PAC, and FECfile (2).</p>	<p>An FEC Virtual Conference for Candidates, PACs and Party Committees was held in August 2021. Party/PAC and FECfile webinars were held in July 2021, Candidate Committee and FECfile webinars were held in September 2021.</p>
<p>RAD implemented the RAD Education Program for the 2020 cycle to provide an informal, education-based means for resolving compliance issues, in lieu of an audit in some cases. Eligible committees have an opportunity to participate in tailored training focused on the issues identified during the review of the committees' reports.</p>	<p>RAD staff identified 2 additional committees (1 Party, 1 PAC) as eligible to participate in the RAD Education Program (for a total of 16), one of which agreed to participate. Training sessions were held for 14 committees (4 Candidate, 4 Party and 6 PACs) and completion letters were sent to all 4 Candidate Committees, 6 PACs and 3 Party committees.</p>

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

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

Performance Goals	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21
RAD to review 75% of reports within 90 days of receipt	92.9%	76.6%	92.2%	76%	91.9%	85.5%
RAD to send 75% of RFAs within 40 days of report review	92%	88%	88%	85%	86%	91%
(b) (7)(E)	100%	96.2%	96.9%	88%	100%	94%
(b) (7)(E)	56%	25%	45%	100%	N/A*	83%
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	81.8%	96.67%	100%	97%	100%	91%
(b) (7)(E)	100%	100%	99%	100%	100%	100%

## Strategic Objective 4: Foster a Culture of High Performance

## Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (9/30/21)
RAD	Documents/ Transactions Coded	53,107/ 19,385,479	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828	4,873/ 63,983,177	4,512/ 134,373,851
	Documents/Pages Processed in Paper Automation/ Conversion System	N/A	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417	1,771/ 18,028	3,308/ 31,902
	Documents/Pages Reviewed	72,084/ 21,415,602	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699	89,525/ 73,526,421	102,219/ 187,079,514
	Letters sent	13,253	14,796	13,763	12,562	13,838	15,360
	Telephone calls handled	12,362	11,634	13,036	13,149	13,209	13,634
	Email inquiries handled	N/A	N/A	396	658	894	968
	Referrals	43	95	46	82	34	103
	AF Cases RTB/FD	83/33	163/168	95/23	262/93	100/204	384/260
	Audit	<b>(b) (7)(E)</b>					
ADRO							
OAR	Cases Received	12	29	8	37	20	34
	Cases Closed (FD)	11	32	10	36	2	42





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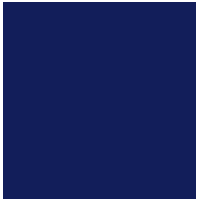












## AF Performance Goals

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Print Date: October 29, 2021

### Selected Parameters:

Office: Both

Start Date: 10/01/2020

End Date: 09/30/2021

\*Exception: YES

# AF Performance Goals

(Confidential and Sensitive)

RAD

(b) (7)(E)

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date
<b>Processed</b>					
2020	YE	H_S_P_UNAUTH	N	01/31/2021	03/31/2021
2020	M12	P_UNAUTH	N	12/20/2020	02/17/2021
2020	30G	UNAUTH	N	12/03/2020	03/17/2021
2020	30G	AUTH	N	12/03/2020	01/22/2021
2020	M11	P_UNAUTH	N	11/20/2020	01/19/2021
2020	12G	UNAUTH_Q	Y	10/22/2020	03/02/2021
2020	12G	AUTH	Y	10/22/2020	12/14/2020
2020	12G	UNAUTH_M	Y	10/22/2020	12/14/2020
2020	M10	P_UNAUTH	N	10/20/2020	12/10/2020
2020	M10	P_UNAUTH	Y	10/20/2020	12/10/2020
2020	Q3	H_S_P_UNAUTH	N	10/15/2020	12/10/2020
2020	Q3	H_S_P_UNAUTH	Y	10/15/2020	12/03/2020
2020	M9	P_UNAUTH	N	09/20/2020	11/16/2020
2020	12P	AUTH	Y	08/27/2020	10/13/2020
2020	M8	P_UNAUTH	N	08/20/2020	10/13/2020
2021	MY	UNAUTH	N	07/31/2021	09/23/2021
2021	M7	P_UNAUTH	N	07/20/2021	09/14/2021
2021	Q2	H_S_P	N	07/15/2021	09/14/2021
2021	M5	P_UNAUTH	N	05/20/2021	06/30/2021
2021	Q1	H_S_P	N	04/15/2021	06/02/2021
2021	M2	P_UNAUTH	N	02/20/2021	04/12/2021

Total AF Reports Processed	21
Average Processing Days	59.29
Percentage to Goal	85.71%

(b) (7)(E)

**Processed - No committees**

Year	Type	Description	Election Sensitive	Due Date	Action Date
2020	30GR	AUTH	N	01/04/2021	02/17/2021
2020	30SGR	AUTH	N	12/31/2020	02/17/2021

(b) (7)(E)

# AF Performance Goals

(Confidential and Sensitive)

## Processed - No committees

Action Date

(b) (7)(E)

Year	Report ID	Auth Type	Flag	Start Date	Action Date
2020	30GR	AUTH	N	12/17/2020	02/12/2021
2020	30SG	AUTH	N	12/03/2020	01/22/2021
2020	12GR	AUTH	Y	11/23/2020	01/19/2021
2020	12SGR	AUTH	Y	11/19/2020	12/22/2020
2020	12GR	AUTH	Y	11/05/2020	12/14/2020
2020	30SG	AUTH	N	10/29/2020	12/14/2020
2020	12SG	AUTH	Y	10/22/2020	12/10/2020
2020	12SG	AUTH	Y	09/17/2020	10/20/2020
2020	12P	AUTH	Y	09/03/2020	10/13/2020
2020	12P	AUTH	Y	08/20/2020	10/13/2020
2021	30SGR	AUTH	N	08/26/2021	09/27/2021
2021	M8	P_UNAUTH	N	08/20/2021	09/23/2021
2021	12SP	AUTH	Y	07/22/2021	09/14/2021
2021	12SGR	AUTH	Y	07/15/2021	09/09/2021
2021	30SG	AUTH	N	07/01/2021	08/26/2021
2021	M6	P_UNAUTH	N	06/20/2021	07/29/2021
2021	30SG	AUTH	N	05/31/2021	07/07/2021
2021	30SGR	AUTH	N	05/24/2021	06/30/2021
2021	12SG	AUTH	Y	05/20/2021	06/24/2021
2021	M4	P_UNAUTH	N	04/20/2021	06/03/2021
2021	12SG	AUTH	Y	04/19/2021	06/03/2021
2021	30SG	AUTH	N	04/19/2021	06/02/2021
2021	12SGR	AUTH	Y	04/12/2021	06/01/2021
2021	M3	P_UNAUTH	N	03/20/2021	04/29/2021
2021	12SG	AUTH	Y	03/08/2021	04/14/2021
2021	30GR	AUTH	N	02/04/2021	04/01/2021
2021	30SGR	AUTH	N	02/04/2021	04/01/2021
2021	12GR	AUTH	Y	12/24/2020	02/17/2021
2021	12SGR	AUTH	Y	12/24/2020	02/17/2021

Total AF Reports Processed-No Committees	31
Average Processing Days	45.55
(b) (7)(E)	
Percentage to Goal	100.00%



# AF Performance Goals

**(Confidential and Sensitive)**

Total AF Reports 52

Average Processing Days 51.10

**(b) (7)(E)**

Percentage to Goal 94.23%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters  
RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters  
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H  
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.

# AF Performance Goals

(Confidential and Sensitive)

## OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2019	MY	3748	C00634964	08/07/2020	10/06/2020	60	Y
2019	M8	3749	C00008409	09/24/2020	11/23/2020	60	Y
2019	Q3	3758	C00615013	09/08/2020	11/06/2020	59	Y
2019	YE	3776	C00634964	08/07/2020	10/06/2020	60	Y
2019	YE	3778	C00615013	09/08/2020	11/06/2020	59	Y
2019	YE	3780	C00426569	08/25/2020	10/23/2020	59	Y
2020	12P	3789	C00676320	08/20/2020	10/19/2020	60	Y
2020	Q1	3816	C00691709	09/17/2020	11/13/2020	57	Y
2020	Q1	3823	C00634964	08/07/2020	10/06/2020	60	Y
2020	Q1	3826	C00615013	09/08/2020	11/06/2020	59	Y
2020	Q1	3827	C00638148	08/08/2020	10/07/2020	60	Y
2020	Q1	3829	C00725994	11/05/2020	01/04/2021	60	Y
2020	Q1	3831	C00676320	08/20/2020	10/19/2020	60	Y
2020	12P	3834	C00154625	08/17/2020	10/16/2020	60	Y
2020	30SG	3848	C00718635	02/11/2021	04/01/2021	49	Y
2020	M6	3853	C00702324	02/16/2021	04/01/2021	44	Y
2020	Q2	3867	C00656033	04/29/2021	06/24/2021	56	Y
2020	Q2	3878	C00710608	02/17/2021	04/16/2021	58	Y
2020	Q2	3883	C00104455	03/18/2021	05/17/2021	60	Y
2020	Q2	3885	C00581199	03/31/2021	09/29/2021	182	N
2020	Q2	3904	C00676320	02/10/2021	03/31/2021	49	Y
2020	M7	3908	C00702324	02/16/2021	04/01/2021	44	Y
2020	12P	3912	C00656033	04/29/2021	06/24/2021	56	Y
2020	12PR	3916	C00741397	03/09/2021	05/07/2021	59	Y

# AF Performance Goals

(Confidential and Sensitive)

2020	M8	3919	C00702324	02/16/2021	04/01/2021	44	Y
2020	M9	3927	C00702324	02/16/2021	04/01/2021	44	Y
2020	Q3	3938	C00743146	02/17/2021	06/25/2021	128	N
2020	Q3	3941	C00710608	02/17/2021	04/16/2021	58	Y
2020	Q3	3944	C00303032	03/23/2021	05/21/2021	59	Y
2020	Q3	3955	C00708941	02/17/2021	04/15/2021	57	Y
2020	Q3	3957	C00656033	04/29/2021	06/24/2021	56	Y
2020	Q3	3962	C00735910	03/26/2021	05/20/2021	55	Y
2020	Q3	3971	C00715748	03/08/2021	05/07/2021	60	Y
2020	Q3	3981	C00581199	03/31/2021	09/29/2021	182	N
2020	M10	4011	C00702324	02/16/2021	04/01/2021	44	Y
2020	12G	4015	C00702324	02/16/2021	04/01/2021	44	Y
2020	48H	4034	C00745760	05/04/2021	07/09/2021	66	N
2020	30G	4075	C00743146	04/27/2021	06/25/2021	59	Y
2020	30G	4080	C00749861	05/19/2021	07/01/2021	43	Y
2020	30G	4086	C00556605	04/16/2021	06/15/2021	60	Y
2020	30G	4094	C00406645	05/24/2021	07/22/2021	59	Y
2020	YE	4131	C00743146	04/27/2021	06/25/2021	59	Y
2020	YE	4149	C00702043	05/06/2021	07/01/2021	56	Y
2020	YE	4181	C00103861	04/27/2021	06/21/2021	55	Y

Total Challenges Processed 44

Average Processing Days 63.14

Total Reports Processed within 60 Days 40

Percentage to Goal 90.91%





# AF Performance Goals

**(Confidential and Sensitive)**

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

## Administrative Fine Program Penalties Assessed and % Collected

	FY 15	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21 (9/30/21)
Total Fines Assessed	\$290,173	\$133,758	\$446,718	\$131,164	\$318,495	\$522,874	\$968,505

**(b) (7)(E)**



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**RECEIVED**

By Office of the Commission Secretary at 3:38 pm, Jan 31, 2022

**SENSITIVE**

January 31, 2022

**MEMORANDUM**

AGENDA DOCUMENT NO. X22-04  
AGENDA ITEM  
For the meeting of February 15, 2022

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista Roche *PCO for KR*  
Director  
Alternative Dispute Resolution Office

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Dayna C. Brown *DCB*  
Assistant Staff Director  
Audit Division

Debbie Chacona *NCA for DC*  
Assistant Staff Director  
Reports Analysis Division

SUBJECT: Status of Compliance – Fiscal Year 2022 – 1<sup>st</sup> Quarter Highlights (10/1/21 – 12/31/21)

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### **Administrative Fine Program (Office of Administrative Review)**

During the first quarter of FY 2022, the Commission processed 18 Reason to Believe (RTB) findings. OAR received challenges in 4 cases and processed 4 Reviewing Officer Recommendations (RORs). The Commission reviewed final determination recommendations in 143 cases, made a final determination that the respondents in 142 cases violated 52 U.S.C. § 30104(a), and assessed \$421,233 in civil penalties. The Commission also collected \$59,078 in fine payments and prepared 101 cases for public release.

**(b) (7)(E)**

OAR forwarded 75% of RORs within 60 days of receipt of each challenge, meeting its strategic goal of processing 75% of RORs within 60 days (Appendix E).

In the first quarter, OAR and RAD worked with the OCIO to prepare for the 2022 Inflation Adjustments for Civil Money Penalties. The adjusted penalties went into effect on December 28, 2021. OAR and RAD ensured necessary updates were made to internal programs, website content, and the Administrative Fine Calculator.
















# Status of Compliance

FY 2022  
(10/1/2021 – 12/31/2021)



## Strategic Objective 1: Engage and Inform the Public about Campaign Finance Data

Performance Goal: Improve the Public's access to information about how campaign funds are raised and spent

Performance Goals	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22 (12/31/21)
RAD to code and enter 95% of reports within 30 days of receipt	95.9%	99.9%	94.1%	98.5%	89.3%	<b>99.1%</b>
RAD to make 100% of reports and statements filed on paper with FEC available on website within 2 business days of receipt	98.7%	99.0%	99.9%	99.8%	99.9%	<b>99.7%</b>
RAD to make 100% of 24- and 48-Hour reports on IE spending filed on paper available within 1 business day of receipt	100%	100%	100%	100%	100%	<b>100%</b>

## Strategic Objective 2: Promote Compliance with the FECA and Related Statutes

## Performance Goal 1: Encourage voluntary compliance with FECA requirements through educational outreach and information

FY 2022 Performance Goals	Status 12/31/21
<p>RAD staff provided extended phone coverage from 5:30pm to 8:00pm for the 2021 October Quarterly reporting deadline.</p>	<p>RAD staff handled 25 calls for the 2021 October Quarterly filing deadline between 5:30pm and 8:00pm. 153 total calls were handled on the October Quarterly filing deadline.</p>
<p>RAD staff collaborated with the Information Division on the FEC Virtual Conference for Candidates, PACs and Party Committees, a webinar for Nonconnected committees, as well as the FEC Connect OnTopic informal discussion on “How to Contact Your Committee’s Analyst.”</p>	<p>The FEC Virtual Conference for Candidates, PACs and Party Committees was held in November 2021. The Nonconnected committee webinar and FEC OnTopic session were held in December 2021.</p>
<p>RAD staff collaborated with OCIO to implement two of the Scam PAC working group’s website recommendations: Displaying Percentage of Political Committee’s Disbursements Spent on Specific Vendors and Amending Column Headers on Political Committee Search Pages to clarify committee types.</p>	<p>The new features went live on FEC.gov in December 2021.</p>

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

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

Performance Goals	FY 17	FY 18	FY 19	FY 20	FY 21	FY22
RAD to review 75% of reports within 90 days of receipt	76.6%	92.2%	76%	91.9%	85.5%	87%
RAD to send 75% of RFAs within 40 days of report review	88%	88%	85%	86%	91%	87%
<b>(b) (7)(E)</b>	96.2%	96.9%	88%	100%	94%	100%
	25%	45%	100%	N/A*	83%	100%
OAR to circulate 75% of Reviewing Officer Recommendations within 60 days	96.67%	100%	97%	100%	91%	75%
<b>(b) (7)(E)</b>	100%	99%	100%	100%	100%	100%

\* No PFARs circulated

## Strategic Objective 4: Foster a Culture of High Performance

## Performance Goal 1: Foster a workplace that delivers results

Office	Deliverable	FY 17	FY 18	FY 19	FY 20	FY 21	FY22 (12/31/21)
RAD	Documents/ Transactions Coded	61,190/ 28,782,160	68,378/ 30,869,828	5,511/ 26,461,828	4,873/ 63,983,177	4,512/ 134,373,851	478/ 14,830,878
	Documents/Pages Processed in Paper Automation/ Conversion System	8,139/ 684,747	8,822/ 902,572	4,962/ 48,417	1,771/ 18,028	3,308/ 31,902	541/ 5,951
	Documents/Pages Reviewed	87,842/ 34,855,133	82,289/ 48,271,726	93,060/ 34,900,699	89,525/ 73,526,421	102,219/ 187,079,514	15,184/ 8,336,969
	Letters sent	14,796	13,763	12,562	13,838	15,360	1,745
	Telephone calls handled	11,634	13,036	13,149	13,209	13,634	2,308
	Email inquiries handled	N/A	396	658	894	968	201
	Referrals	95	46	82	34	103	18
	AF Cases RTB/FD	163/168	95/23	262/93	100/204	384/260	18/135
	Audit	<b>(b) (7)(E)</b>					
ADRO							
OAR	Cases Received	29	8	37	20	34	4
	Cases Closed (FD)	32	10	36	2	42	8



























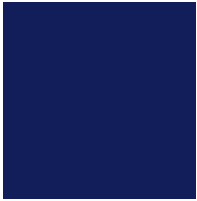












## AF Performance Goals

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Print Date: **January 31, 2022**

### Selected Parameters:

Office: Both

Start Date: 10/01/2021

End Date: 12/31/2021

\*Exception: YES

# AF Performance Goals

(Confidential and Sensitive)

## RAD

Year	Type	Description	Election Sensitive	Due Date	RTB Circ Date
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(b) (7)(E)

### Processed

2021	Q3	H_S_P	N	10/15/2021	11/22/2021
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Total AF Reports Processed	1
Average Processing Days	38.00

(b) (7)(E)

Percentage to Goal	100.00%
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### Processed - No committees

Action Date

(b) (7)(E)

2021	12SG	AUTH	Y	10/21/2021	12/01/2021
2021	12SP	AUTH	Y	10/21/2021	12/01/2021
2021	M10	P_UNAUTH	N	10/20/2021	12/01/2021
2021	M10	P_UNAUTH	Y	10/20/2021	12/01/2021
2021	Q3	H_S_P	Y	10/15/2021	11/16/2021
2021	M9	P_UNAUTH	N	09/20/2021	11/02/2021

Total AF Reports Processed-No Committees	6
Average Processing Days	40.17

(b) (7)(E)

Percentage to Goal	100.00%
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# AF Performance Goals

**(Confidential and Sensitive)**

Total AF Reports 7

Average Processing Days 39.86

(b) (7)(E)

Percentage to Goal 100.00%

RAD returns any processed run where the RTB Circ Date falls within the Start Date and End Date parameters  
RAD returns any processed-no committees run where the update\_date falls within the Start Date and End Date parameters  
processed are those that have a RTB Circ Date or a status of processed-no committees, does NOT include report type 48H  
sorted by Report Year, Due Date, Report Description, Report Type, Election Sensitive

\* Exception - As a result of the 2013 government shutdown, the system is recording an incorrect process date for the 2013 M8. If YES is selected, the 2013 M8 process date is adjusted to 10/18/13.

# AF Performance Goals

(Confidential and Sensitive)

## OAR

Year	Type	AF #	Committee ID	Chal Rcpt Date	ROR Circ Date	# Days	Within 60 Days
2020	30G	4091	C00726224	11/05/2021	12/16/2021	41	Y
2020	48H	4221	C00742528	08/24/2021	12/09/2021	107	N
2020	48H	4224	C00607200	09/20/2021	11/04/2021	45	Y
2020	48H	4225	C00711572	09/01/2021	10/21/2021	50	Y

Total Challenges Processed 4

Average Processing Days 60.75

Total Reports Processed within 60 Days 3

Percentage to Goal 75.00%

OAR returns AF where the ROR Circ Date falls within the Start Date and End Date parameters

## Administrative Fine Program Penalties Assessed and % Collected

	FY 16	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22 (12/31/21)
Total Fines Assessed	\$133,758	\$446,718	\$131,164	\$318,495	\$522,874	\$968,505	\$421,233

**(b) (7)(E)**