

**Executive Summary of Strategic Plan Final Progress Report  
(captures work performed November 2014 – June 2015)**

**Critical Goals:**

**1. Restore Commission and staff capacity to meet core functions.**

- The FY 16-17 budget includes funding to add one additional IT position, funding to move some, but not necessarily all IT infrastructure to cloud based services, and funding for ongoing maintenance and licensing costs for core PDC software systems. The office reorganization at the beginning of FY 16 provides an additional position in the Compliance & Enforcement Division.

**2. Adopt a long-term, sustainable plan to deliver and maintain a state-of-the art system that meets our customers' needs and stays current with their evolving expectations.**

- FY 16-17 appropriation, finalized in June 2015, allows the PDC to shift how many elements of IT infrastructure funding, from cyclical capital investments to stable and predictable operating expenses. This includes moving certain hardware and software to cloud based services or the state data center and paying on a consistent fee-for-service basis (eliminating PDC ownership and maintenance responsibilities for capital assets), changing to a leasing model for personal computers (eliminating the periodic capital “refresh” costs of upgrading agency desktop and laptop computers); replacing PDC’s unsupported telephone infrastructure with a cloud-based service that is managed by a third party (eliminating PDC ownership and maintenance responsibilities for capital assets) and purchasing new customer service/case management services and digital outreach-communications services to improve the PDC customer experience with more user-friendly and informative online options for connecting with PDC..
- The Chief Technology Officer created an online project portfolio for prioritizing and managing the backlog of projects. The portfolio is managed by the executive management team and focused on meeting the needs of our customers in the most timely, efficient and effective manner possible. Priorities are driven by both customer needs and business cycles so that improvements can be delivered when they have the greatest value for the effort.

## **Additional Goals:**

### **3. Increase the effectiveness of educational and compliance efforts.**

- In June, the PDC staff and Secretary of State's Election Information Systems Supervisor began collaborating to join the agencies' candidate filing applications so that filers are able to file the declaration and PDC reports sequentially in one online session. The work will not likely be completed in time for the 2016 candidate filing period. An interim plan is in place for the SOS to provide daily lists of declaration filers with contact information to the PDC Outreach staff so that PDC filing information can be quickly supplied to the new candidates.

### **4. Improve the efficiency and effectiveness of enforcement efforts.**

- The Commission commenced rule making in April 2015 to develop alternatives to adjudicative proceedings for enforcing RCW 42.17A and Title 390 WAC.
- Compliance and Enforcement Manual development continued through the end of June 2015, including an updated Section 3 draft and General Enforcement Processes, in preparation for adoption of the Commission's alternative response rules.
- Created complaint return letter templates to expedite disposition of complaints that are not investigated. Instituted advance calendaring of enforcement hearings to enable staff to better plan and prepare for hearings.

### **5. Adapt the Commission's methods of receiving and distributing data to the changing technological environment in which we and our customers operate.**

- Passage of SB 5810 allows all agencies, including the PDC, to use electronic signatures whenever a signature is required. PDC staff established an implementation schedule for transitioning all of the agency's electronic filing systems to electronic signatures.

### **6. Expand the size of the audience that is aware of the PDC's mission and that accesses PDC data and information.**

- The PDC partnered with King County Elections to produce TV and radio "informed voter" PSAs. Production occurred in June 2015 and the PSAs aired for a month before the primary election and will air again before the general election. Print ads were produced as well, which have been distributed to county election officers and libraries for website display.



**Public Disclosure Commission**  
Shining Light on Washington Politics Since 1972

**Public Disclosure Commission**  
**2013-15 Strategic Plan**  
October 2014 Progress Report

Final Progress Report  
(captures work performed through June 2015)

**Mission Statement**

The Public Disclosure Commission was created and empowered by Initiative of the People to

- provide timely and meaningful public access to accurate information about the financing of political campaigns, lobbyist expenditures, and the financial affairs of public officials and candidates, and
- ensure compliance with and equitable enforcement of Washington's disclosure and campaign finance laws.

**Vision Statement**

We are dedicated to ensuring and enhancing public confidence in the political process and government.

**Statutory Authority**

The Public Disclosure Commission is created pursuant to RCW 42.17A.100. The Commission's powers and duties are set forth in RCW 42.17A.050, 42.17A.105, 42.17A.110, 42.17A.755 and other provisions of Ch. 42.17A RCW.

## **CRITICAL GOALS**

### **1. Restore Commission and staff capacity to meet core functions.**

1.1 In the short term, identify staffing and resources needed to restore lost capacity in IT, audit, investigative, outreach, policy, and oversight functions.

Who: Executive management team, Commissioners  
When: June 2014, in time for Commission review prior to budget decision package deadline (September 2014)

**STATUS:** Budget decision packages have been developed and submitted for the 2015-17 biennium reflecting the agency's IT strategic plan objectives of getting out the utility-based IT infrastructure and services business and employing innovative solutions to the PDC's need for IT network/systems administration and support. Specific items in the packages address 1.1 and 1.2 by requesting funding to continue software licenses and maintenance agreements for key software; and funding to support a technology intern program to fill unmet need for IT systems administration and network support. Other items in the packages request ongoing funding to move much of PDC's IT infrastructure to the state data center and to migrate other aspects of our operations to a cloud-based system, both of which will provide improved backup and remove disaster recovery capabilities.

**UPDATE:** Done. The FY 16-17 budget includes funding to add one additional IT position, funding to move some, but not necessarily all IT infrastructure to cloud based services, and funding for ongoing maintenance and licensing costs for core PDC software systems. The office reorganization at the beginning of FY 16 provides an additional position in the Compliance & Enforcement Division.

1.2 Obtain supplemental budget appropriations for currently unfunded IT maintenance and network administration expenses (e.g., expired and expiring licensing/support agreements, and IT network administration staff position).

Who: Executive Director, Chief Technology Officer, Commissioners

When: June 2014, in time for Commission review prior to budget decision package deadline (September 2014)

**STATUS:** See 1.1.

1.3 Secure remote disaster recovery services and seek stable funding for retention of same.

Who: Executive Director, Chief Technology Officer,  
Commissioners

When: Session 2014

**STATUS:** See 1.1.

**2. Adopt a long-term, sustainable plan to deliver and maintain a state-of-the-art system that meets our customers' needs and stays current with their evolving expectations.**

2.1 Develop a six-year plan for investing in and paying for IT infrastructure (hardware and software capital, O&M, and replacement) that will deliver a robust, user-friendly interface with our filers and the public.

Who: Executive Director, Chief Technology Officer,  
Commissioners

When: June 2014 in time for Commission review prior to budget decision package deadline (September 2014)

**STATUS:** PDC's budget decision packages include requests to shift how many elements of PDC's IT infrastructure are funded, from cyclical capital investments to stable and predictable operating expenses. This includes moving certain hardware and software to the state data center and paying on a consistent fee-for-service basis (eliminating PDC ownership and maintenance responsibilities for capital assets), changing to a leasing model for personal computers (eliminating the periodic capital "refresh" costs of upgrading agency desktop and laptop computers); replacing PDC's unsupported telephone infrastructure with a cloud-based service that is managed by a third party (eliminating PDC ownership and maintenance responsibilities for capital assets) and purchasing new customer service/case management services and digital outreach-communications services to improve the PDC customer experience with more user-friendly and informative online options for connecting with PDC.

UPDATE: FY 16-17 appropriation, finalized in June 2015, allows the PDC to shift how many elements of IT infrastructure funding, from cyclical capital investments to stable and predictable operating expenses. This includes moving certain hardware and software to cloud based services or the state data center and paying on a consistent fee-for-service basis (eliminating PDC ownership and maintenance responsibilities for capital assets), changing to a leasing model for personal computers (eliminating the periodic capital “refresh” costs of upgrading agency desktop and laptop computers); replacing PDC’s unsupported telephone infrastructure with a cloud-based service that is managed by a third party (eliminating PDC ownership and maintenance responsibilities for capital assets) and purchasing new customer service/case management services and digital outreach-communications services to improve the PDC customer experience with more user-friendly and informative online options for connecting with PDC.

2.2 Develop a forward-looking list of technology projects that recognizes the changes in campaign practices and the ways in which the public seeks and consumes data.

Who: Executive management team  
When: June 2014

STATUS: PDC has begun implementing some of the priority recommendations from our IT assessment, which included using an IT project portfolio and software development lifecycle (SDLC) to improve the agency’s IT Governance. The project portfolio is a tool to assist in the management, tracking and prioritization of development projects. SDLC is a best practice that will result in better upfront evaluation of the scope of new IT projects, including the long-term maintenance and operation implications, before development begins. As ideas for new technology projects arise to recognize changes in campaign practices and the ways in which the public seeks and consumes data, the projects will be vetted and prioritized through the portfolio and SDLC processes. Adopting these best practices will initially increase the time required to complete new applications and projects, but will also dramatically improve quality and end-user satisfaction, as well as improve the long-term sustainability of the projects.

UPDATE: The Chief Technology Officer created an online project portfolio for prioritizing and managing the backlog of projects. The portfolio is managed by the executive management team and focused on meeting the needs of our customers in the most timely, efficient and effective manner possible. Priorities are driven by both customer needs and business cycles so that improvements can be delivered when they have the greatest value for the effort.

- 2.3 Commissioners meet with legislative leaders and policy and fiscal committee members as needed.
- Who: Commission Chair and/or Vice Chair, Executive Director, General Counsel
- When: As warranted.

**STATUS:** Chair Degginger met in September and October with legislative leaders and the Governor's senior budget advisers regarding PDC's 2015-17 biennial budget requests.

**UPDATE:** Done. During the 2015 legislative session, Chair Degginger met with Senator Andy Hill and appeared before the Senate Ways & Means Committee to discuss the PDC's budget and IT needs.

### **ADDITIONAL GOALS**

#### **3. Increase the effectiveness of educational and compliance efforts.**

3.1 Seek out opportunities to coordinate/collaborate with partners who support PDC's educational efforts to improve compliance with disclosure requirements.

Who: Communications & Training Officer, Outreach staff  
When: List of potential opportunities by end of March 2014.

3.2 Re-engage with Secretary of State and County auditors to provide immediate, automated notification of PDC requirements to candidates upon submission of declarations of candidacy.

Who: Communications & Training Officer  
When: Start late February 2014.

**UPDATE:** Done. In June, the PDC staff and Secretary of State's Election Information Systems Supervisor began collaborating to join the agencies' candidate filing applications so that filers are able to file the declaration and PDC reports sequentially in one online session. The work will not likely be completed in time for the 2016 candidate filing period. An interim plan is in place for the SOS to provide daily lists of declaration filers with contact information to the PDC Outreach staff so that PDC filing information can be quickly supplied to the new candidates.

3.3 Create an online virtual learning center with content for campaigns, lobbyists, and other filers to gain immediate, on-demand access to answers for the most common questions.

Who: Communications & Training Officer, Chief Technology Officer, Outreach & IT Staff  
When: Complete planning of content by June/July 2014 (Goal 2.2); Implementation dependent upon resources (Goal 1)

3.4 Locate existing videos in areas of website that are easier for users to find and access.

Who: Outreach Staff  
When: December 2013.

**STATUS: Done.**

3.5 Update printed materials (e.g., manuals & brochures) to make more inviting, easier to use for all audiences, and to encourage voluntary electronic filing (even when not required).

Who: Communications & Training Officer; Communications Consultant  
When: Brochures completed by December 2013; Manuals by March 2014.

**STATUS: Done. Brochures reformatted, hyperlinks added to annuals and brochures, annotated forms added to manuals, etc.**

3.6 Review F-1 requirements to consider changes to laws and rules concerning: reporting thresholds (\$2,000 & \$10,000 thresholds); type and manner of reporting investments (stock values & mutual funds, short-term vs. long-term holds, highest value vs snapshot in time); and the nature and extent of reporting business ownership interests.

Who: General Counsel, Communications & Training Officer, Commission  
When: Start April 2014, to complete by September 2014 deadline for submitting agency-request legislation.

**STATUS: Done. Filer work group convened to review specified filing requirements. The work group's recommendations were presented to the Commission in June 2014. Rule making underway to adjust dollar amounts of current disclosure ranges A-E. Agency request legislation to implement some of the recommendations has been prepared and submitted for the 2015 session.**



3.7 Evaluate the feasibility of using a short form for certain local F-1 filers.

Who: General Counsel, Communications & Training Officer,  
Commission

When: Start April 2014, to complete by September 2014 deadline  
for submitting agency-request legislation.

**STATUS:** Done. The evaluation was part of the work group's (see 3.6) review. Based on the results of the evaluation, PDC's agency-request legislation does not include a proposal for a short form for local filers.

3.8 Review mini-reporting rules, procedures, and related outreach in order to reduce the number of campaigns that seek to switch from mini to full reporting (because incorrect or inappropriate reporting option was originally selected) and improve the process for those that do.

Who: Executive Director, Communications & Training Officer,  
Lead Political Finance Specialist

When: Start Summer 2014. Finalize by December 2014.

**DONE:** Rule making to amend mini reporting rules completed May 2014. Staff is surveying candidates and campaigns who have switched options in the past to determine what additional outreach efforts are needed.

3.9 Begin targeted outreach to potential lobbyist employers to let them know of lobbyist filing requirements.

Who: Communications & Training Officer, Outreach Staff

When: Fall 2014

**STATUS:** Handout explaining requirements created and distributed at Secretary of State's October and November 2013 charity/nonprofit symposiums.

3.10 Implement reference manual task force to discuss its use, audience and expansion in order to improve staff's ability to provide timely and consistent guidance based on prior research and advice. Determine new indexes, and grouping schemes.

Who: Communications & Training Officer, Outreach &  
Compliance staff

When: Create staff work group by October 2013; Meet quarterly  
through 2014 to identify and implement tasks.

**4. Improve the efficiency and effectiveness of enforcement efforts.**

4.1 Enhance and adopt guidance for alternative responses to non-compliance (e.g., technical assistance, warning/advisory letters, notices of correction, etc.) and amend regulations accordingly.

Who: Executive Director, Director of Compliance, General Counsel, Sr. Assistant Attorney General  
When: Spring 2014

**STATUS:** Developing guidance for candidates making false statements of incumbency. Developing standard warning letters for candidates failing to include sponsor identification in political advertising.

**UPDATE:** The Commission commenced rule making in April 2015 to develop alternatives to adjudicative proceedings for enforcing RCW 42.17A and Title 390 WAC.

4.2 Create a Compliance and Enforcement Manual.

Who: Compliance Coordinator, Director of Compliance, Executive Director, General Counsel, Sr. Assistant Attorney General  
When: Underway, draft to Commission spring 2014

**STATUS:** Continuing progress in developing Compliance and Enforcement Manual.

**UPDATE:** Compliance and Enforcement Manual development continued through the end of June 2015, including an updated Section 3 draft and General Enforcement Processes, in preparation for adoption of the Commission's alternative response rules.

4.3 Prepare an informational brochure to better inform Complainants, Respondents, and the public about the complaint investigation/enforcement process.

Who: Compliance Coordinator, Director of Compliance, Executive Director  
When: Begin November 2013 for completion by January 2014.

**STATUS:** Done. Completed and posted to PDC website in January 2014.

4.4 Continue streamlining process for conducting formal investigations and bringing cases to conclusion, including use of subpoena, preparation of Reports of Investigation and Notice of Administrative Charges, preparation of "Minor Action" letters or formal dismissals, and recommendations for enforcement actions.

Who: Director of Compliance, Executive Director, Sr. Assistant  
Attorney General  
When: Ongoing

**STATUS:** Staff has been discussing ways to create more comprehensive investigative plans earlier in each investigation in an effort to make investigations shorter and more efficient. Staff has also been continuing its efforts to better utilize the penalty factors outlined in WAC 390-37-182 when developing penalty recommendations.

**UPDATE:** Created complaint return letter templates to expedite disposition of complaints that are not investigated. Instituted advance calendaring of enforcement hearings to enable staff to better plan and prepare for hearings.

**5. Adapt the Commission's methods of receiving and distributing data to the changing technological environment in which we and our customers operate.**

5.1 Overhaul/modernize the agency's website using responsive design to improve usability across a range of mobile platforms.

Who: Chief Technology Officer and IT staff  
When: 6 months post funding/contracting

**STATUS:** The Executive Team has created an internal staff work group to begin developing the requirements for a request for proposals (RFP) to hire a vendor to assist with gathering stakeholder input, and then designing and building a new website for the PDC.

5.2 Explore options to modernize the signature card process in a way that provides secure verification of filer identities without the need to mail a physical signature card.

Who: Chief Technology Officer, Communications & Training  
Officer, Commission  
When: Staff to develop plan with options for presentation to Commission by February 2014. Implement per Commission direction.

**STATUS:** The Commission has included in its agency-request legislation for 2015 proposed amendments to the places in Chapter 42.17A RCW that require reports to be "signed" by the filer. Staff has been exploring available alternatives such as using the State of Washington's Secure Access Washington as a platform for PDC filers to establish secure accounts that could then be connected to PDC filing applications.

**UPDATE:** Passage of SB 5810 allows all agencies, including the PDC, to use electronic signatures whenever a signature is required. PDC staff established an implementation schedule for transitioning all of the agency's electronic filing systems to electronic signatures.

5.3 Modify/Create more online applications and specialized widgets to push data out to the public without users needing to come to our website.

Who: Chief Technology Officer, IT Staff  
When: Identify list of options for Commission consideration by January 2014; implement as time and resources allow.

5.4 Create more user-friendly online forms and/or applications and make them available through more platforms.

Who: Chief Technology Officer & IT Staff, Communications & Training Officer & Filer Assistant Specialists, Commission  
When: Identify list of options for Commission consideration by January 2014; implement as time and resources allow (per funding in Goals 1 & 2); possible rulemaking required by Commission.

5.5 Evaluate, through a pro-active stakeholder process, whether the Commission should begin posting on-line some or all information from candidate and annual F-1 forms and, if limited information from F-1s is to be posted, how to accomplish that in a technologically feasible manner and within available resources.

Who: Communications & Training Officer, Communications Consultant, Chief Technology Officer  
When: Reach out to affected associations, media, and legislative caucuses by January 2014. Report back by retreat for 2014.

Commission

**STATUS:** Done. Stakeholder engagement concluded June 2014. Staff recommendations presented to Commission during August 2014 retreat. "Request an F-1" button added to website.

5.6 Identify and seize opportunities to encourage all filers to move to electronic filing, even when not required.

Who: Communications & Training Officer, Outreach Staff, Compliance Staff  
When: Develop workplan by January 2014

5.7 As resources allow, modify current online filing systems for Lobbyists and Lobbyist Employers to parse L-2 and L-3 detailed information into searchable database.

Who: Chief Technology Officer, Application Developer, Solutions Developer, Quality Assurance Manager  
When: Dependent upon resources.

**6. Expand the size of the audience that is aware of the PDC's mission and that accesses PDC data and information.**

6.1 Develop partnerships with existing civic organizations and voter registration efforts to include information about the PDC in relevant activities/curriculum/publications.

Who: Communications & Training Officer, Executive Team, Commission  
When: Prepare list of potential partnership opportunities by January 2014 to target during 2014; Add to performance measures

**STATUS: Initial list of partnership opportunities developed November 2013.**

6.2 Expand the agency's use of social media to reach new, younger audiences.

Who: Communications & Training Officer; Communications Consultant  
When: Incorporate planning with 2.2, to be implemented as resources allow

6.3 Produce public service announcements, op-ed articles, and other promotional material, to increase public awareness and use of the PDC's website and data.

Who: Communications & Training Officer; Executive Director  
When: Ongoing

**STATUS: The PDC partnered with King County Elections to produce TV and radio "informed voter" PSAs. Production occurred in June 2015 and the PSAs aired for a month before the primary election and will air again before the general election. Print ads were produced as well, which have been distributed to county election officers and libraries for website display.**

### Performance Measures – FY 2015

<b>GOAL 3: Increase the effectiveness of educational and compliance efforts</b>			
<b>Performance Measures</b>	<b>FY 13 Actual</b>	<b>Target</b>	<b>FY 15 Actual</b>
Percentage of candidates, political committees, lobbyists, and public officials who meet statutory filing deadlines.	98.42%	100%	99.57%
Number of new training videos produced.	N/A	3	0
Number of in-house training classes conducted and number of attendees trained.	26/249	30/286	18/193
Number of external training/outreach opportunities attended (live or via videoconference) and number of attendees reached.	10/412	18/600	9/296
<b>GOAL 4: Improve the efficiency and effectiveness of enforcement efforts</b>			
<b>Performance Measure</b>	<b>FY 13 Actual</b>	<b>Target</b>	<b>FY 15 Actual</b>
Percentage of candidates, political committees, lobbyists, and public officials who meet statutory filing deadlines.	98.42%	100%	99.57%
Percentage of complaints that are triaged within 2 weeks of receipt (i.e., returned, acknowledged for additional info, or opened as formal investigation)	36%	90%	86.4%
Percentage of routine investigations completed within 90 days.	N/A	85%	100%
Percentage of moderately complex investigations completed within six months.	50%	90%	40%
Percentage of complex investigations completed within 12 months.	33%	90%	40%

<b>GOAL 5: Adapt the Commission's methods of receiving and distributing data to the changing technological environment in which we and our customers operate</b>			
<b>Performance Measure</b>	<b>FY 13 Actual</b>	<b>Target</b>	<b>FY 15 Actual</b>
Percentage of report pages processed <ul style="list-style-type: none"> <li>• Electronically</li> <li>• Manually</li> </ul>	81% 19%	90% 10%	81% 19%
Average number of days from receipt of electronically filed campaign reports to posting on web site.	<1	<1	<1
Average number of days from receipt of paper filed campaign reports to posting on web site	<1	<1	<1
Percentage of lobbyists filing reports <ul style="list-style-type: none"> <li>• Electronically</li> <li>• On paper</li> </ul>	65% 35%	70% 30%	65% 35%
Percentage of lobbyist employers filing reports <ul style="list-style-type: none"> <li>• Electronically</li> <li>• On paper</li> </ul>	23% 77%	25% 75%	19% 81%
Percentage of state agencies filing lobbying reports <ul style="list-style-type: none"> <li>• Electronically</li> <li>• On paper</li> </ul>	40% 60%	Effective Jan 2014, all state agencies are required to file electronically	
Percentage of local agencies file lobbying reports <ul style="list-style-type: none"> <li>• Electronically</li> <li>• On paper</li> </ul>	23% 77%	30% 70%	35% 65%
<b>GOAL 6: Expand the size of the audience that is aware of the PDC's mission and that accesses PDC data and information</b>			
<b>Performance Measures</b>	<b>FY 13 Actual</b>	<b>Target</b>	<b>FY 15 Actual</b>
Number of unique visitors to PDC website & number of visits	93,228*/ 286,310*	125,000/ 300,000	107,487 260,429

Number of references to PDC website/data appearing in on-line news publications	414	500	622
Number of web-users who "like" PDC Facebook page	325	500	633