

# DISTRICT OF COLUMBIA OFFICE OF THE INSPECTOR GENERAL

OIG Project No. 18-I-04CJ

September 2018



## OFFICE OF CAMPAIGN FINANCE EVALUATION OF THE REPORTS ANALYSIS AND AUDIT DIVISION



### *Guiding Principles*

*Workforce Engagement \* Stakeholders Engagement \* Process-oriented \* Innovation \*  
Accountability \* Professionalism \* Objectivity and Independence \* Communication \* Collaboration  
\* Diversity \* Measurement \* Continuous Improvement*

## **Mission**

Our mission is to independently audit, inspect, and investigate matters pertaining to the District of Columbia government in order to:

- prevent and detect corruption, mismanagement, waste, fraud, and abuse;
- promote economy, efficiency, effectiveness, and accountability;
- inform stakeholders about issues relating to District programs and operations; and
- recommend and track the implementation of corrective actions.

## **Vision**

Our vision is to be a world class Office of the Inspector General that is customer-focused, and sets the standard for oversight excellence!

## **Core Values**

Excellence \* Integrity \* Respect \* Creativity \* Ownership  
\* Transparency \* Empowerment \* Courage \* Passion  
\* Leadership



**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**Office of the Inspector General**

**Inspector General**



September 26, 2018

Cecily E. Collier-Montgomery  
Director  
Office of Campaign Finance  
Frank D. Reeves Municipal Building  
2000 14<sup>th</sup> Street, NW, Suite 433  
Washington, DC 20009

Dear Director Collier-Montgomery:

This letter serves as my Office's final report of evaluation of the Office of Campaign Finance's (OCF) Reports Analysis and Audit Division (RAAD). This report (1) summarizes our observations of RAAD's audit processes as defined in OCF written guidance and exemplified in the five audit reports that constituted the scope of our evaluation<sup>1</sup> and (2) presents several opportunities for improvement we identified through the interviews, observations and research we conducted during fieldwork. We conducted this evaluation using quality standards promulgated by the Council of the Inspectors General on Integrity and Efficiency. The OIG may elect to conduct a future evaluation of the RAAD to assess the extent to which OCF has addressed the opportunities for improvement.

On August 1, 2018, the OIG provided OCF with a draft report detailing several observations and corresponding opportunities for improvement in the RAAD. Your response, which we received on September 5, 2018, is attached to this letter.

While the planned and ongoing actions described in your response appear to meet the intent of our five identified opportunities for improvement within the RAAD, I would like to reiterate our observation regarding staff training, which begins on page 5 of this report, because your response does not specifically address it. The OIG noted: (1) "completed coursework and other professional development opportunities have consisted largely of topics in DCHR's workforce development series, and fundamentals such as writing, presentation skills, Word and Excel;" and (2) "a disparity between the knowledge required for OCF auditor positions, and the tools and techniques currently used in RAAD." The OIG encourages OCF to seek additional opportunities to enhance employees' auditing skills and knowledge.

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<sup>1</sup> The OIG reviewed OCF's audit responsibilities and processes as defined in D.C. Code, D.C. Municipal Regulations, and internal policies and procedures, and the following audit reports: Report # RAAD-03-30-2017 (*Audit Report On Brandon Todd For Ward 4 Principal Campaign Committee 2015 Special Election*); Report # RAAD-10-25-2016 (*Audit Report on Brianne for DC Principal Campaign Committee 2014 General Election*); Report # RAAD-09-30-2016 (*Audit Report on La Ruby May 2015 Principal Campaign Committee 2015 Special Election*); Report # RAAD-04-25-2016 (*Audit Report on Elissa 2014 Principal Campaign Committee 2014 Election Year*); and Report # RAAD-11-20-2015 (*Audit Report on Charles Allen for Ward 6 Principal Campaign Committee 2014 Election Year Newly Elected Official*).

## BACKGROUND

OCF's mission is "to regulate and provide public disclosure of the conduct, activities, and financial operations of candidates, political committees, exploratory committees, transition, inaugural, legal defense committees, and constituent service and statehood fund programs to ensure public trust in the integrity of the election process and government service. The OCF administers and enforces the campaign finance laws of the District of Columbia."<sup>2</sup> It does so by conducting audits, investigating alleged violations of the Campaign Finance Reform Act, holding informal hearings to address alleged violations, and educating candidates and political committees on District reporting and disclosure requirements.

RAAD's primary function is to "conduct [ ] audits of OCF programs and operations to promote economy, efficiency, and effectiveness; to ensure compliance, to prevent and detect fraud; and to keep the agency's Director informed of its findings."<sup>3</sup> D.C. Code Section 1-1163.04(8) authorizes the OCF Director to conduct audits and investigations of reports and statements filed by candidates and their campaign committees with OCF, as well as "alleged failures to file any report or statement" required by D.C. Code. At the time of our fieldwork, 9 of RAAD's 13 FTEs were filled, which consisted of an audit manager, a supervisory auditor, and seven auditors; four auditor FTEs were vacant.

## OVERVIEW OF FULL FIELD AUDIT PROCESS

RAAD's audit program consists of three primary phases: pre-audit, audit, and post-fieldwork.

**Pre-Audit** – The objective of the pre-audit phase is to afford RAAD staff members a general understanding of the reports and information already provided to OCF by the candidate or political committee being audited (auditee). During this phase, among other tasks, RAAD auditors review various statements and forms filed with OCF pertaining to the auditee; print and examine reports of receipts and expenditures; research applicable D.C. Code and D.C. Municipal Regulations; and read correspondence between OCF and the auditee.

**Audit** – At the beginning of the audit phase, RAAD arranges an entrance conference with the auditee to explain the audit's purpose and procedures, introduce RAAD staff members, and solicit suggestions regarding areas that may require special attention. RAAD staff then work to understand the auditee's accounting procedures and key personnel; analyze documentation such as bank statements, records of credit card contributions, expenditure invoices and payment receipts, and reports pertaining to fundraising events; and identify discrepancies and possible instances where the auditee has not complied with record-keeping requirements or contribution limitations.

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<sup>2</sup> District of Columbia: Office of Campaign Finance website, <https://ocf.dc.gov/page/mission-and-goals-OCF> (last visited Aug. 10, 2018).

<sup>3</sup> District of Columbia: Office of Campaign Finance website, <https://ocf.dc.gov/page/audit-analysis-reports> (last visited Aug. 10, 2018).

**Post-Fieldwork** – At the conclusion of fieldwork, RAAD conducts an exit conference with the auditee to discuss any deficiencies noted and obtain comments. RAAD then prepares and submits a Preliminary Audit Report to the Director of OCF that summarizes the results of the audit, “including any discrepancies ... or apparent violations noted...” OCF then issues the Preliminary Audit Report to the auditee, incorporates comments received from the auditee, and issues a final report to the auditee that is also posted to OCF’s website.

## **SUMMARY OF OBSERVATIONS**

During our evaluation, we observed that RAAD auditors are provided clear written procedures that they appear to understand and follow, and routinely meet with RAAD managers and members of OCF’s Office of General Counsel to discuss their work. Collectively, the following elements of OCF audit operations indicate the internal control environment is well-defined and reinforced through meetings with management:

- RAAD maintains Standard Operating Procedures manual (SOP) that defines and explains OCF’s authority, audit standards, duties, and work processes, with references to D.C. Code and OCF forms.
- RAAD’s SOP includes a detailed audit program that auditors use to conduct their work. The audit program enumerates specific steps auditors must follow to verify the accuracy and thoroughness of information provided by the auditee.
- RAAD auditors whom we interviewed were all aware of the SOP and the audit program, and stated that they are required to adhere to it.
- The SOP and audit processes undergo annual review and revisions, as needed (e.g., to incorporate enacted changes to D.C. Code) by the Audit Manager. The SOP provided to the OIG was last revised in July 2017, and RAAD’s audit manager informed us it was also revised in November 2017.
- RAAD auditors said they routinely meet with RAAD’s supervisory auditor and audit manager to review and discuss their work.
- RAAD employees receive support from OCF’s Public Information and Records Management Division and Office of the General Counsel.

To review examples of completed OCF audits, the OIG reviewed the audit files provided by OCF for five selectively sampled audits. Each audit file consisted of paper and electronic files in various formats (e.g., Word, Excel, PDF, emails) with an inventory cover sheet detailing each file’s contents.

Overall, we found that each audit file contained extensive, organized documentation, such as:

- emails and letters exchanged between OCF RAAD and the auditees;
- bank statements, images of checks, credit card contribution records, invoices, and donor cards;
- Excel spreadsheets reflecting analyses that the auditors completed;
- requests for additional information that OCF RAAD issued to each campaign and the responses received; and
- completed forms that auditees submitted to OCF, such as statements of candidacy and statements of campaign committee organization.

With regard to each audit's final report, all five reports followed a standard format that presents background on the candidate and other campaign personnel; an explanation of the audit's scope; detailed findings and recommendations regarding receipts and expenditures, or, an auditor's statement that there were no findings; and in some instances, "other matters noted." The audit reports consistently provide useful cites to applicable criteria found in D.C. Code and references to dates of key audit activities, such as the date on which an auditee provided additional documentation requested by OCF. Each report concludes with an "overall recommendation" and determination of whether the auditee was in compliance with D.C. Code Section 1-1163.09. In conclusion, we found each audit report imparted a concise understanding of both OCF's audit work and resulting conclusions, and the auditee's actions and responses to recommendations made during the audit process.

## **OPPORTUNITIES FOR IMPROVEMENT**

The OIG team did not identify deficiencies in RAAD's audit processes. However, as the D.C. Council Committee on the Judiciary and Public Safety (Committee) commented in its draft FY 2019 Budget Report (2019 Committee report) dated May 4, 2018, the media and community advocates recently criticized the timeliness of a particular OCF audit report. The 2019 Committee report also cited an allegation that OCF mishandled documents submitted by the auditee, and recommended "that OCF carefully monitor its records system to ensure that files are maintained securely and accurately."<sup>4</sup> Cognizant of this criticism, the OIG presents the following opportunities to improve OCF audit capabilities.

### **IMPLEMENT WORKPAPER SOFTWARE TO IMPROVE AUDIT EFFICIENCY, ORGANIZATION OF INFORMATION AND DOCUMENTATION**

As noted earlier, each of the five audit files we reviewed contained both paper documents and electronic files in Word, Excel, PDF, and email formats. While the audit files were clearly

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<sup>4</sup> *Id.* at 175.

inventoried and organized, the volume and variety of information that OCF receives from an auditee (some of which the auditee uploads to OCF's Online Filing System<sup>5</sup>) and creates during the course of an audit, likely pose challenges in terms of organization, referencing, and retrieval. Software tools currently available to RAAD auditors primarily consist of Microsoft Excel and Word. Several interviewees suggested that audit software such as Workiva or TeamMate could improve their efficiency by eliminating some of the manual, time-consuming, and repetitive review and referencing processes they currently perform during audits. Audit software affords users the capability to store information and documents in multiple formats and link findings and conclusions to supporting evidence and analyses.

**Opportunity for Improvement #1:** The OIG believes that RAAD staff would benefit from the implementation of software that enables them to organize the information they receive during an audit, and reference their analyses directly to supporting documents stored in a single, secure repository.

### **ENGAGE MORE WITH THE CAMPAIGN FINANCE OVERSIGHT “COMMUNITY OF PRACTICE,” SEEK INPUT ON TECHNOLOGY AND TRAINING INITIATIVES THAT ENHANCE RAAD OPERATIONS AND EFFECTIVENESS**

In the performance oversight responses you submitted to the Committee earlier this year, you stated that OCF is a member of the Council on Governmental Ethics Laws<sup>6</sup> (COGEL). The OIG also acknowledges that OCF periodically consults with analogous agencies that have experience with legislation similar to initiatives introduced or being considered the Council, as it has with regard to public financing of political campaigns.

**Opportunity for Improvement #2:** The OIG encourages OCF to continue to build and expand upon those relationships, seeking input from COGEL members and other peer agencies on the opportunities for improvement presented herein.

**Training, Job Tools** - In speaking with RAAD staff and reviewing travel and training information submitted to the D.C. Council over the past several years, it appears that completed coursework and other professional development opportunities have consisted largely of topics in DCHR's workforce development series, and fundamentals such as writing, presentation skills, Word, and Excel. The annual “specialized training” delivered to OCF employees recently included “Auditing Essentials,” “Data Collection and Analysis,” “Developing and Presenting Audit Findings,” and “Writing Audit Reports by Objectives.”

As evidenced by these titles from the upcoming and past COGEL annual conference schedules, the campaign finance oversight “community of practice” is an active forum for exchanging ideas and information, and an opportunity to enhance OCF employees' auditing and enforcement skills and experience and build awareness of emerging issues:

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<sup>5</sup> See <https://ocf.dc.gov/page/online-filing-system-overview> (last visited July 17, 2018).

<sup>6</sup> COGEL is “a professional organization for government agencies and other organizations working in ethics, elections, freedom of information, lobbying, and campaign finance.” See <https://cogel.site-ym.com/page/Bylaws> (last visited Aug. 9, 2018).

- “Campaign Finance Update – Exploring Legislative and Regulatory Trends”
- “Enforcement Update – What’s New in Investigations and Enforcement”
- “Preparing the Case I – The Nuts and Bolts of Thorough Investigations”
- “Protect Your Agency from Data Breaches, Phishing Scams, and Other Hacks”
- “Data & Disclosures: Using Data Mining Tools & Techniques to Promote Campaign Finance Compliance”

The OIG also noted a disparity between the knowledge required for OCF auditor positions, and the tools and techniques currently used in RAAD. OCF auditor position descriptions cite the need for demonstrated ability in using automated audit analysis and audit project management tools such as “Audit Command Language Software,” TeamMate, statistical analysis software, and other “automated tools used to facilitate the audit process.”

**Opportunity for Improvement #3:** As several interviewees cited the need for improved software and other technology that supports their work processes, the OIG encourages OCF to consult with peer agencies to identify and implement such improvements.

With the proliferation of new technologies designed to easily transfer funds between entities (e.g., PayPal, Venmo, and Bitcoin), and challenges with accurately and fully identifying political contributors’ affiliated entities<sup>7</sup> using public information and information provided by the auditee, the task of determining whether an individual or entity has exceeded contribution limitations is a difficult one.

**Opportunity for Improvement #4:** Therefore, the OIG encourages OCF to earmark resources annually and identify opportunities to more actively participate in the campaign finance oversight “community of practice” with the specific objective of advancing its audit techniques and technologies.

### **Public Trust, Awareness**

Continuing on page 152 in its 2018 Committee report, the Committee noted that “members of the public criticized OCF’s auditing process—specifically, that the process does not provide voters with relevant information about candidates in a timely manner.” The Committee recommended that OCF “closely examine their existing procedures to determine whether new procedures could be implemented to facilitate the process and keep the public better informed.”<sup>8</sup> In its 2019 Committee report at page 173, the Committee again addressed the topic of public trust and awareness:

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<sup>7</sup> In its Fiscal Year 2018 Budget Report (2018 Committee report) dated May 18, 2017, at page 152 the Committee on the Judiciary and Public Safety wrote: “In [OCF’s] responses to the Committee’s performance oversight questions, it noted that affiliated entities of business contributors were only listed in 27 instances, out of the 378 business donors to political action committees from February 1, 2015, through December 31, 2016. This number is extremely low, and the Committee strongly urges the agency to intensify its efforts to promote compliance with this reporting requirement.”

<sup>8</sup> *Id.* at 153.



The Committee ... believes OCF can do a better job of sharing updates with the public throughout the auditing process. . . . Testimony from public witnesses at the agency’s oversight hearings, as well as at other hearings on legislation, has revealed a lack of public trust of OCF’s enforcement of the District’s campaign finance laws. The public clearly believes that OCF can and should do a better job of holding candidates and committees accountable for campaign finance law violations – as well as improve information flow of such violations to the public.

OCF has stated it would be unethical and inconsistent with Federal Election Commission procedure to publish a preliminary audit report.<sup>9</sup> Oversight entities similar to OCF undoubtedly face a similar challenge: delivering accurate, thorough information that is relevant to stakeholders’ decision-making.

**Opportunity for Improvement #5:** The OIG encourages OCF to engage COGEL leadership and peer agencies in the campaign finance compliance “community of practice” to solicit and vet new ways through which OCF can deliver useful, timely information to the public prior to the issuance of its final audit reports.

## CONCLUSION

RAAD auditors are provided clear written procedures that guide their work, and routinely meet with RAAD managers and OCF’s Office of General Counsel to discuss their audits. The five RAAD audit files that we reviewed consisted of paper and electronic files in various formats (e.g., Word, Excel, PDF, email); due to the volume and variety of information that OCF receives from an auditee and produces during an audit, the OIG believes RAAD staff would benefit from the implementation of software that enables them to organize and reference their work directly to supporting documents stored in a single, secure repository. The OIG also encourages OCF to earmark resources annually and regularly pursue opportunities to more actively participate in the campaign finance oversight “community of practice” to advance its audit techniques and technologies, and identify best practices for building public trust and awareness of OCF’s work.


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<sup>9</sup> See 2018 Committee report at 152.

Cecily Collier-Montgomery, Office of Campaign Finance  
Letter Regarding OIG Evaluation of the RAAD  
OIG Final Report No.18-I-04CJ0  
September 26, 2018  
Page 8 of 12

We appreciate the cooperation and courtesies extended to our staff during this project. If you have any questions concerning this report, please contact me or Edward Farley, Assistant Inspector General for Inspections and Evaluations, at (202) 727-2540.

Sincerely,



Daniel W. Lucas  
Inspector General

DWL/ef

cc: See Distribution List

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**OFFICE OF CAMPAIGN FINANCE  
DISTRICT OF COLUMBIA BOARD OF ELECTIONS  
WASHINGTON, D.C. 20003**

September 5, 2018

Daniel Lucas  
Inspector General  
Office of Inspector General  
Government of the District of Columbia  
717 14<sup>th</sup> Street NW 5<sup>th</sup> Floor  
Washington, DC 20005

**Re: Evaluation of the Reports Analysis and Audit Division (RAAD)  
Office of Campaign Finance**

Dear Inspector General Lucas:

Thank you for the opportunity to provide a Response to your Office's evaluation of the Reports and Analysis and Audit Division (RAAD) of the Office of Campaign Finance.

This Office shall adopt the findings noted in the "Summary of Observations" section of the Office of the Inspector General's (OIG) Evaluation of the OCF Audit process and also acknowledges that "the OIG team did not identify deficiencies in RAAD's audit processes".

More specifically, the Office of Campaign Finance has and/or will undertake the following actions in the noted areas:

**IMPLEMENT WORKPAPER SOFTWARE TO IMPROVE AUDIT EFFICIENCY, ORGANIZATION OF INFORMATION AND DOCUMENTATION**

In an effort to streamline the audit process, and aid the procurement process, the Office of Campaign Finance has scheduled appointments for demonstrations of the following internal audit management software solutions for the OCF Reports Analysis and Audit Division: TeamMate on August 30, 2018 (Online Web Demonstration), September 4, 2018 (Discovery Call), and September 11, 2018 (WebEx Demonstration); and Workiva on September 13, 2018 (Onsite Demonstration). The Audit Manager previously met with representatives of Workiva on May 24, 2018, and the group has been invited for a second demonstration.

Further, the OCF Agency Managers met with the Director of the Division of Candidacy and Campaign Finance, for the Maryland State Board of Elections, on June 15, 2018, in Annapolis, Maryland, and with the Executive Director and Managers of the New York City Campaign Finance Board (NYCCFB) on July 19, 2018 in New York City, to discuss and observe the Public Funding Programs of both Jurisdictions. As you may know, the "Fair Elections Amendment Act of 2018", effective May 5, 2018, was enacted by the Council of the District of Columbia to establish

a Fair Elections Program in the Office of Campaign Finance to provide for publicly funded political campaigns. In this regard, Montgomery County, Maryland, recently implemented public funding for the financing of campaign operations during its 2018 Election Cycle, and the NYCCFB has one of the most successful public funding programs in the Country.

During the meeting in New York, the OCF Audit Manager and Supervisory Audit Manager reviewed the NYCCB Audit Program, specifically, to determine how software applications may assist the NYCCFB to conduct audits, and the timeframes for their audit process. The NYCCFB advised that the New York online disclosure software (the C-Smart System) has the capability to receive scanned copies of bank records, deposit slips and loan documents, and that these documents must be submitted with each filing. The NYCCFB verifies reported contribution information with each filing, and focuses primarily on reported expenditures during audits conducted at the end of an election cycle. The NYCCFB generally requires between 14-18 months to complete the audit process.

As a consequence, the Office of Campaign Finance will explore the enhancement of the OCF E-Filing and Disclosure System to provide for the scanning and upload of bank records with the filing of each financial report in a further effort to significantly improve and expedite the audit process.

**ENGAGE MORE WITH THE CAMPAIGN FINANCE OVERSIGHT "COMMUNITY OF PRACTICE," SEEK INPUT ON TECHNOLOGY AND TRAINING INITIATIVES THAT ENHANCE RAAD OPERATIONS AND EFFECTIVENESS**

As the OIG acknowledges, the OCF does consult with the Federal Elections Commission and analogous agencies in other jurisdictions concerning their experience with the implementation of similar proposed local campaign finance legislation, and the organization and structure of their programs. The OCF also routinely researches other campaign finance websites to compare their procedures, laws and regulations in certain areas, and the type, manner or format of data captured and disseminated to the public. Further, the Office of Campaign Finance recognizes the Council on Governmental Ethics Laws (COGEL), as an invaluable resource for campaign finance information. The OCF through its membership in COGEL has accessed the COGEL online Forums Link to collaborate with other Campaign Finance officials on specific topics, and has benefitted from the opportunity to attend past COGEL conferences and network with government administrators in the campaign finance arena. The Office of Campaign Finance will be represented at the 2018 COGEL Conference scheduled for December 9-12, 2018 in Philadelphia, Pennsylvania, and will pursue annually the earmark of resources to participate regularly in future COGEL conferences.

Last, in the "Opportunities For Improvement" section, the OIG report states that the Committee of the Council of the Judiciary and Public Safety commented in its Report (dated May 4, 2018), that the media and community advocates recently criticized the timeliness of a particular OCF audit report... that the "auditing process does not provide voters with relevant information about candidates in a timely manner".

In response to this allegation, we submit that although this is not an OIG finding, the Office of Campaign Finance has enhanced its Educational Outreach programs through Entrance Conferences, community engagement with the Board of Elections, the distribution of brochures and the expanded dissemination of information through upgrades in the electronic filing system and the website, to heightened our ability to fulfill our regulatory responsibilities to provide transparency and disclosure of the financial operations of the registrants under the Campaign Finance Act.

Nonetheless, we will continue to strive to assure that the OCF operates at the highest level of competency with maximum transparency, without compromising the integrity of the audit or

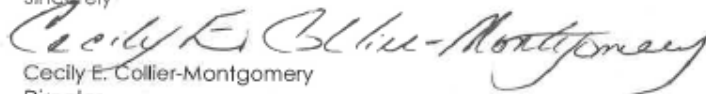
investigative process. The goal of the Agency is to release an audit report in a timely and useful manner for the public. The Audit Report at issue was an exception due to the numerous issues encountered during the audit process. Notwithstanding, we submit each audit is unique, and that the completion of the audit may vary dependent upon the number of receipt and disbursement transactions reported, the availability of all underlying documentation, the organization and completeness of records, the audit scope and the issues that develop during the audit, and the opportunity to respond, and the consideration of the responses to the draft audit.

To ensure the continuous flow of information to the public during the course of an ongoing audit, the OCF includes a listing of all active audits, and the issuance of any final audit reports in its production reports which are presented monthly at the public meetings of the Board of Elections, and published at the OCF Website, with notice of their availability posted at the OCF Facebook Page, Twitter Account, and Subscription Service.

The OIG report additionally mentioned that the May 4, 2018 Committee report also cited an allegation that the OCF mishandled documents submitted by the auditee. In response, the documents in question were never mishandled by the OCF and an electronic copy has always been available. Moreover, the documents in question were not related to the audit. Finally, any alleged deficiencies regarding the handling of documents submitted to the OCF have been cured by the implementation of a secured internal filing system which requires that files are signed out and returned in the Office of the Public Information and Records Management Manager.

Again, we thank you for the opportunity to respond and we will continue to maintain the highest standards in our auditing, analyzing and compliance efforts. If you have further questions concerning this response, please contact me or [REDACTED] at [REDACTED]

Sincerely



Cecily E. Collier-Montgomery  
Director  
Office of Campaign Finance  
1015 Half Street SE Suite 775  
Washington, DC 20003

cc: Alice P. Miller, Executive Director, District of Columbia Board of Elections  
D. Michael Bennett, Chairman of the Board of Elections