GOVERNMENT OF THE DISTRICT OF COLUMBIA
BOARD OF ETHICS AND GOVERNMENT ACCOUNTABILITY

Office of Government Ethics

February 15, 2017

Honorable Charles Allen
Committee on the Judiciary and Public Safety
Council of the District of Columbia
1350 Pennsylvania Avenue, N.W., Suite 406
Washington, D.C. 20004

RE: Board of Ethics and Government Accountability's 2017 Responses to the Performance Oversight Questions

Dear Councilmember Allen:

Thank you for this opportunity to provide responses to the Performance Oversight Questions contained in the Committee on the Judiciary's correspondence dated January 30, 2017. The members of the Board and I look forward to providing testimony and answering these and any other questions you might have at the Hearing scheduled on February 23, 2017. The questions and answers are set forth below:

General Questions

1. Please provide a current organizational chart for the agency, including the number of vacant, frozen, and filled FTEs in each division or subdivision. Include the names and titles of all senior personnel and provide the date that the information was collected on the chart.

   See EXHIBIT 1 - BEGA Organizational Chart.

   a. Please provide an explanation of the roles and responsibilities for each division and subdivision.

      The Board of Ethics and Government Accountability (BEGA) is responsible for overseeing the Office of Government Ethics (OGE) and the Office of Open Government (OOG). The Office of Government Ethics administers and enforces the District of Columbia Code of Conduct.

More specifically, OGE investigates alleged violations of the Code of Conduct; adjudicates violations of the Code of Conduct; provides mandatory ethics training; issues rules and regulations governing the ethical conduct of employees and public officials; oversees lobbyist registration and activity reporting; manages and oversees the financial disclosure filing requirements for District employees and officials; drafts an annual ethics Best Practices Report and an Ethics Manual; and provides for the anonymous and confidential receipt of information related to violations of the Code of Conduct or other information with regard to the administration or enforcement of the Code.

There are no subdivisions under OGE.

The Office of Open Government is an Office under BEGA with its own Director and will provide responses to the Pre-hearing questions under separate cover.

b. Please provide a narrative explanation of any changes made during the previous year.

There have been no changes to the structure of the agency in the last year.

2. Please provide a current Schedule A for the agency which identifies all employees by title/position, current salaries, fringe benefits, and program. The Schedule A should also indicate if the positions are continuing/term/temporary/contract and whether they are vacant or frozen positions.

See EXHIBIT 2 – BEGA Schedule A.

a. For each vacant position, please provide the status of the agency's efforts to fill the position, as well as the position number, title, program number, activity number, grade, salary, and fringe associated with each position. Separate salary and fringe. Please also indicate whether the position must be filled to comply with federal or local law.

A vacant position is expected to open on February 17, 2017, when an attorney advisor will take another position in the government.

b. For each filled position, please provide the employee's length of service with the agency.

See BEGA Schedule A (Exhibit 2).

3. Please list all employees detailed to or from your agency, if any. For each employee identified, please provide the name of the agency the employee is detailed to or from, the reason for the detail, the date of the detail, and the employee's projected date of return.

There have been no details.

4. Please provide the Committee with:

   a. A list of all employees who received or retained cellphones, personal digital assistants, or similar communications devices at agency expense in FY16 and FY17, to date;

      The following employees are assigned cellphones at the Agency's expense:

      <u>2016</u>: Deborah Lathen, Darrin Sobin, Traci Hughes and Brian Flowers had cellphones. Also, Deborah Lathen and Carol Schwartz, and Darrin Sobin had iPads.

      <u>2017</u>: Darrin Sobin, Traci Hughes, Brian Flowers, Ronald Cook, Ileana Corrales, Jessica Dillion, and Sandra Peterson have cellphones. Also, Carol Schwartz, Norma Hutcheson, Tameka Collier and Shomari Wade, and Darrin Sobin have iPads.

   b. A list of all vehicles owned, leased, or otherwise used by the agency and to whom the vehicle is assigned, as well as a description of all vehicle accidents involving the agency's vehicles in FY16 and FY17, to date;

      The Agency has no leased or owned vehicles. The Agency participates in the Fleet Share (DPW) program, and Ronald Cook, Sr., and Ileana Corrales are authorized drivers. There have been no vehicular accidents involving BEGA's use of government vehicles.

   c. A list of employee bonuses or special award pay granted in FY16 and FY17, to date;

      There have been no bonuses or special award pay granted.

   d. A list of travel expenses, arranged by employee for FY16 and FY17, to date, including the justification for travel; and

      FY 2016 Travel Expenses

Employee	***Travel Expense***	***Justification***
Deborah Lathen, Board member	$869.87	Ethics Conference/Training
Darrin Sobin, Director	$1,771.36	Ethics Conference/Training and Other Training
Traci Hughes, Director	$1,445.00	Conference/Training
Brian Flowers, General Counsel	$890	Ethics Conference/Training
		Total: $4,976.23

FY 2017 Travel Expenses

Employee	***Travel Expense***	***Justification***
Sandra Peterson, Admin. Officer	$788.20	Training
Darrin Sobin, Director	$914.92	Ethics Conference/Training
Jack Grimaldi, Senior Attorney-Advisor	$914.92	Ethics Conference/Training
Brian Flowers, General Counsel	$914.92	Ethics Conference/Training **Total: $3,532.96**

e. A list of the total overtime and workers' compensation payments paid in FY16 and FY17, to date, including the number of employees who received overtime and workers' compensation payments.

There have been no overtime or workers' compensation payments.

5. Regarding the use of communication devices:

a. What procedures are in place to track which individuals or units are assigned mobile devices (including, but not limited to smartphones, laptops, and tablet computers)? Please include how the usage of these devices is controlled.

BEGA maintains an up-to-date inventory log of all mobile communication devices, which includes the employees' name, type of communication device, telephone number and equipment tracking number.

b. How does your agency limit the costs associated with its mobile devices?

BEGA manages and limits its mobile communications and devices by using the FCMS System to view and track monthly costs. The Agency also reduces costs by limiting its communication device purchases for personnel.

c. For FY16 and FY17, to date, what was the total cost including, but not limited to, equipment and service plans for mobile communications and devices?

In FY 2016 $4,111.25 was spent for equipment and service plans for mobile communications and devices.

In FY 2017 $976.13 was spent for equipment and service plans for mobile communications and devices.

6. For FY16 and FY17, to date, please list all intra-District transfers to or from the agency.

See EXHIBIT 3 – BEGA FY16 and FY17 Intra-District Transfers.

7. For FY16 and FY17, to date, please identify any special purpose revenue funds maintained by, used by, or available for use by the agency. For each fund identified, provide: (1) the revenue source name and code; (2) the source of funding; (3) a description of the program that generates the funds; (4) the amount of funds generated by each source or program; (5) expenditures of funds, including the purpose of each expenditure; and (6) the current fund balance.

   See EXHIBIT 4 - BEGA FY16 and FY17 Special Purpose Revenue.

8. For FY16 and FY17, to date, please list any purchase card spending by the agency, the employee making each expenditure, and the general purpose for each expenditure.

   See EXHIBIT 5 - BEGA FY16 Purchase Card Expenditure Report.

   See EXHIBIT 6 - BEGA FY17 Purchase Card Expenditure Report.

9. Please list all memoranda of understanding ("MOU") entered into by your agency during FY16 and FY17, to date, as well as any MOU currently in force. For each, indicate the date on which the MOU was entered and the termination date.

   See EXHIBIT 7 - BEGA FY16 and FY17 Memoranda of Understandings.

10. Please list the ways, other than MOU, in which the agency collaborated with analogous agencies in other jurisdictions, with federal agencies, or with non-governmental organizations in FY16 and FY17, to date.

    OGE frequently collaborates with the federal Office of Government Ethics for ethics matters, the U.S. Office of Special Counsel for Hatch Act related matters, the National Association of Attorneys General, the Center for the Advancement of Public Integrity ("CAPI" at the Columbia Law School) and the Council on Government Ethics Laws (COGEL) which is a private organization the membership of which is comprised of government employees from all 50 States and the District of Columbia.

11. Please list all currently open capital projects, including an update on all capital projects under the agency's purview in FY16 and FY17, to date, and the amount budgeted, actual dollars spent, and any remaining balances. In addition, please provide:

    a. An update on all capital projects begun, in progress, or concluded in FY15, FY16, and FY17, to date, including the amount budgeted, actual dollars spent, and any remaining balances.

       There have been no capital projects.

    b. An update on all capital projects planned for FY17, FY18, FY19, FY20, FY21, and FY22.

Not applicable.

c. Do the capital projects begun, in progress, or concluded in FY15, FY16, or FY17, to date, have an impact on the operating budget of the agency? If so, please provide an accounting of such impact.

Not applicable.

12. Please provide a list of all budget enhancement requests (including, but not limited to, capital improvement needs) for FY16 and FY17, to date. For each, include a description of the need and the amount of funding requested.

See EXHIBIT 8 - BEGA FY16 and FY17 Budget Enhancement Requests.

13. Please list, in chronological order, every reprogramming in FY16 and FY17, to date, that impacted the agency, including those that moved funds into the agency, out of the agency, and within the agency. Include the revised, final budget for your agency after the reprogrammings for FY16 and FY17. For each reprogramming, list the date, amount, rationale, and reprogramming number.

See EXHIBIT 9 – BEGA FY16 Reprogramming. There has been no reprogramming in FY17.

14. Please list each grant or sub-grant received by your agency in FY16 and FY17, to date. List the date, amount, and purpose of the grant or sub-grant received.

There have been no grants.

15. How many FTEs are dependent on grant funding? What are the terms of this funding? If it is set to expire, what plans, if any, are in place to continue funding the FTEs?

Not applicable.

16. Please list all pending lawsuits that name the agency as a party. Identify which cases on the list are lawsuits that potentially expose the District of Columbia to significant financial liability and/or will result in a change in agency practices, and the current status of the litigation. Please provide the extent of each claim, regardless of its likelihood of success. For those identified, please include an explanation about the issues involved in each case.

With the exception of cases on appeal by Respondents who have been sanctioned by the Board for ethical misconduct or failure to make timely filings, there are no lawsuits currently pending against this Office.

17. Please provide the total number of administrative complaints or grievances that the agency received in FY16 and FY17, to date, broken down by source. Please describe the process utilized to respond to any complaints and grievances received and any changes to agency policies or procedures that have resulted from complaints or grievances received.

Insofar as this Office, in the course of discharging its day to day duties, receives and responds to complaints of ethical misconduct, *see answer to question 14 under Agency Operations below.*

Beyond these official tasks, there have been no administrative complaints or grievances against the agency.

18. Please list and describe any ongoing investigations, audits, or reports on the agency or any employee of the agency, or any investigations, studies, audits, or reports on the agency or any employee of the agency that were completed during FY16 and FY17, to date.

a.) A cybersecurity study was conducted on the agency's e-filing system for Lobbyists and Financial Disclosure Statement filers between November 2016 and January 2017 by the Office of the Chief Financial Officer (this was a government-wide review). Numerous cybersecurity vulnerabilities were detected. The cause of the vulnerabilities was deemed to be outdated coding. Working with the Office of the Chief Technology Officer and an outside vendor the vulnerabilities were rectified in the short term and the system remains operational. Because of these issues and other recurring IT problems, a study was performed by OCTO to determine agency IT needs. The results of this study, as well as a cost estimate, was included in a Capital Budget Request for FY 18'. *See Answer to question 23 below.*

b) A government-wide fee study was conducted by the Mayor's Office to determine whether agency fees charged to the public were appropriate. This included an analysis of whether the Lobbyist registration fees charged by BEGA are adequate and consistent with those of other jurisdictions. We understand that the results of that study have not yet been finalized.

Other than these two matters, there have been no investigations, audits, reports or studies on the agency or any employee.

19. Please describe any anticipated spending pressures for the remainder of FY17. Include a description of the pressure, the estimated amount, and any proposed solutions.

The agency began the Fiscal Year with a $30,000 shortfall in PS funds. The shortfall is being covered from NPS Funds and O-Type Funds, but this is only a short term solution insofar as those funds had been designated for other agency needs. Moreover, the agency has two employees on FMLA with a combined 16 weeks of paid leave, and those positions must be temporarily filled for the entire four month period of FMLA leave. PS Funds to do so are lacking. Finally, the agency lost its IT support from the Office of Open Government and had to request funds in the amount of $30,000 to move its website to an OCTO platform. Failure to have an active website would not only have hindered the efforts of the agency in its ethics/advice duties but would have made it impossible for Lobbyists and Public Officials to file their Lobbyist reports and Financial Disclosure Statements insofar

as current rules require this to be done electronically through the website. Finally, as mentioned above, it is important to quickly overhaul the Lobbyist/FDS e-filing system to ensure usability and cybersecurity. For all of these reasons, there is some risk to agency operations in the later stages of FY 17' because of a shortfall of funds.

It should also be noted that the Council recently passed legislation entitled the Council Financial Disclosure Amendment Act of 2016. The statute will require Councilmembers to file Public Financial Disclosure Statements with BEGA twice per year – May 15th and November 15th – instead of once a year as they do currently. This Act will apply upon the date of inclusion of its fiscal impact in an approved budget and financial plan. The fiscal impact is estimated by the OCFO to be $94,000 for FY 2017 and then $45,000 for FY 2018. The bulk of this cost is to modify the e-filing system to accommodate the new filings. BEGA notified the Mayor's Budget team of this legislation and it is being factored into the enhancement request in the upcoming budget proposal.

20. Please provide a copy of the agency's FY16 performance plan. Please explain which performance plan objectives were completed in FY16 and whether they were completed on time and within budget. If they were not, please provide an explanation.

    See EXHIBIT 10 - BEGA FY16 Performance Plan. All Objectives were met timely and within budget, refer to page two for details.

21. Please provide a copy of your agency's FY17 performance plan as submitted to the Office of the City Administrator

    See EXHIBIT 11 - BEGA FY17 Performance Plan.

22. Please provide the number of FOIA requests for FY16 and FY17, to date, submitted to your agency. Include the number granted, partially granted, denied, and pending. In addition, please provide the average response time, the estimated number of FTEs required to process requests, the estimated number of hours spent responding to these requests, and the cost of compliance.

FOIA Requests	***FY 2016***	***FY 2017***
Number of FOIA requests received during reporting period	21	6
Number of requests granted, in whole…	1	1
Number of requests granted, in part, denied, in part	2	2
Number of requests denied, in whole	1	3
Pending as of Sept. 30, 2016	1	1
The average number of days unfilled requests have been pending before each public body as of September 30, 2016	4.5 days	10.2
Number of staff hours devoted to processing FOIA requests	30	4
Total dollar amount expended by public body for processing FOIA requests	$2,780.00	Less than $1,000

23. Please provide a list of all studies, research papers, reports, and analyses that the agency prepared or contracted for during FY16 and FY17, to date. Please state the status and purpose of each. Please submit a hard copy to the Committee.

    BEGA enlisted the assistance of the Office of the Chief Technology Officer to assess our current Financial Disclosure and Lobbyist e-Filing systems. This effort focused on the review, analysis, and documentation of both systems, to include documenting any required enhancements to the applications. These applications support a core function of the Agency's mission critical operations. This assessment will enable us to determine if these systems should be enhanced for future use, or discarded in place of new applications that may better accommodate the demands of our growing agency.

    See EXHIBIT 12 - BEGA FY17 Study of e-Filing System.

24. Please separately list each employee whose salary was $100,000 or more in FY16 and FY17, to date. Provide the name, position number, position title, program number, activity number, salary, and fringe. In addition, state the amount of any overtime or bonus pay received by each employee on the list.

    See EXHIBIT 13 – BEGA FY16 and FY17 Employee Salaries Over $100,000. There has been no overtime or bonus pay.

25. Please list in descending order the top 25 overtime earners in your agency in FY16 and FY17, to date, if applicable. For each, state the employee's name, position number, position title, program number, activity number, salary, fringe, and the aggregate amount of overtime pay earned.

    There has been no overtime pay.

26. For FY16 and FY17, to date, please provide a list of employee bonuses or special award pay granted that identifies the employee receiving the bonus or special pay, the amount received, and the reason for the bonus or special pay.

    There have been no bonuses or special award pay.

27. Please provide each collective bargaining agreement that is currently in effect for agency employees. Please include the bargaining unit and the duration of each agreement.

    There has been no collective bargaining agreement.

28. If there are any boards or commissions associated with your agency, please provide a chart listing the names, confirmation dates, terms, and wards of residence of each member. Include any vacancies. Please also attach agendas and minutes of each board or commission meeting in FY16 or FY17, to date, if minutes were prepared. Please inform the Committee if the board or commission did not convene during any month.

Board Member	*Confirmation Date*	*Term*	*Ward*
Robert Spagnoletti, Chair	10-Jul-12	6 Years	4
Deborah Lathen, Member	10-Jul-12	4 Years	4
Carol Schwartz, Member	16-Dec-15	4 Years	1
Shomari Wade, Member	28-Jun-16	6 Years	1
Norma Hutcheson, Member	28-Jun-16	6 Years	4
Tameka M. Collier, Member	1-Nov-16	4 Years	2

See EXHIBIT 14 – BEGA FY16 and FY17 Agendas. BEGA maintains its monthly meeting agendas and audio files of the meeting on its Website. No minutes were prepared.

29. Please list all reports or reporting currently required of the agency in the District of Columbia Code or Municipal Regulations. Provide a description of whether the agency is in compliance with these requirements, and if not, why not (e.g. the purpose behind the requirement is moot, etc.).

- D.C. Official Code § 1-1162.19 – Advisory Opinions
- D.C. Official Code § 1-1162.20 – Quarterly Complaint Report
- D.C. Official Code § 1-1162.02(b) – Best Practices Report
- D.C. Official Code § 2-576 (3) – Notice of meetings, including agenda
- D.C. Official Code § 2-578(b)(1) – Copies of minutes
- D.C. Official Code § 1-1162.24 (c) – List of public officials who have filed a public financial disclosure statement, received an extension of the deadline for filing, or not filed
- D.C. Official Code § 1-1162.29(b)(2) – summary of registered lobbyist information by August 15th or within 10 days after registering

The Agency is in compliance with all reporting obligations.

30. Please list each contract, procurement, lease, and grant awarded, entered into, extended and option years exercised, by your agency during FY16 and FY17, to date. For each contract, please provide the following information, where applicable:

a. The name of the contracting party;
b. The nature of the contract, including the end product or service;
c. The dollar amount of the contract, including budgeted amount and actually spent;
d. The term of the contract;
e. Whether the contract was competitively bid;
f. The name of the agency's contract monitor and the results of any monitoring activity; and
g. Funding source.

See EXHIBIT 15 - BEGA FY16 and FY17 Procurements/Purchase Orders. BEGA did not enter into any contract, lease or grant.

31. Please provide a list of any additional training or continuing education opportunities made available to agency employees. For each additional training or continuing education program, please provide the subject of the training, as well as the number of agency employees that were trained.

    See EXHIBIT 16 - BEGA FY16 and FY17 Staff Additional Training/Education Opportunities.

32. Does the agency conduct annual performance evaluations of all its employees? Who conducts such evaluations? What steps are taken to ensure that all agency employees are meeting individual job requirements?

    All agency employees receive an annual performance evaluation. The evaluations are conducted by the General Counsel, for staff under his direct supervision, and by the Director for staff under his direct supervision. Each employee is given annual performance goals and achievement, or non-achievement of those goals, is reflected in the annual evaluation. Weekly staff meetings and a semi-annual one on one meeting with each employee, help to ensure that goals are being met.

Agency Operations

1. Please describe any initiatives that the agency implemented in FY16 or FY17, to date, to improve the internal operations of the agency or the interaction of the agency with outside parties. Please describe the results, or expected results, of each initiative

   See BEGA FY16 and FY17 Performance Plans (Exhibits 10 and 11).

2. What are the agency's top five priorities? Please explain how the agency expects to address these priorities in FY17.

   a) **Overhaul of the Lobbyist Registration and Financial Disclosure Statement E-Filing system. It is difficult to overstate the need to replace the current e-filing system with a new version based upon up to date computer code. The current system was inherited from the Office of Campaign Finance in 2012 when BEGA was created and, we are advised, was 12 years old at that time and at the end of its usefulness. The result has been a patch work approach to fixing the system as problems arise, the most recent being a near shut down of the e-filing system because of cyber security issues discovered by the Office of the Chief Financial Officer. This would be particularly problematic given that current rules require Lobbyists and FDS filers to make required filings with the agency only using the e-filing system.**

   b) **Reintroduction and implementation of the now lapsed Comprehensive Code of Conduct (CCC) legislation. This is the agency's top legislative**

priority this year. Once the CCC is passed by the Council and signed into law by the Mayor, BEGA will immediately begin implementation. The implementation plan will include training all ethics counselors of the government on the revisions to the ethics code, revising and republishing the Ethics Manual, and modifying the BEGA database of Formal Advice Opinions to ensure consistency with the new code.

c) **<u>Increasing training capacity.</u> There are two mandatory ethics training requirements with respect to District government employees: 1) All District government employees must receive ethics training upon hire, which currently is accomplished during the New Employee Orientations; and 2) Financial Disclosure Statement Filers must receive annual ethics training, the compliance rate of which is not currently known. In addition to enforcement of this recurring training requirement, the agency will put special emphasis on increasing its training capacity, especially with the expected implementation of the CCC. This will include producing a second training video for government employees (the first was produced in the last fiscal year), developing remote access training modules, further increasing the library of ethics presentations to include specialty topics such as post-employment and outside activities, and focusing on train-the-trainer efforts intended to allow ethics counselors to provide ethics training directly to agency personnel. The agency will also continue to publish its monthly newsletter -- "Ethically Speaking" -- which provides updates on ethics law, enforcement actions and advisory opinions. It is distributed to agency ethics counselors who are encouraged to redistribute to all agency employees.**

d) **<u>Lobbyist Activity Report Auditing</u>. The agency currently has over 250 registered lobbyists under its purview. Until only recently, the agency had not had an auditor to conduct audits of lobbyist activity reports. In the last year, 10 trial audits of lobbyists were conducted implementing auditing protocols that had been developed the previous Fiscal year. With the protocols implemented and 10 audits completed, we expect to ramp up auditing substantially in the upcoming year.**

e) **<u>Increasing Financial Disclosure Statement Compliance</u>. Since the passage of the Ethics Act, which created BEGA, and the resulting assumption of employee Financial Disclosure Statement filing responsibility from the Office of Campaign Finance, there has been confusion among agency personnel concerning who must be designated as a filer. BEGA has made significant progress in helping agencies correctly identify and designate required filers during the last three filing cycles and at least for public filers posted a near 100% percent compliance rate – a first. However, Confidential Filer compliance, which is in the first instance overseen by agencies is still lacking. This year the agency will aggressively enlist the assistance of agency officials to further increase compliance and will shortly publish a rulemaking that will allow BEGA to impose late fees on delinquent confidential filers (such late fees**

currently are only available with respect to public filers). A certificate of excellence will be awarded to agency's that are in compliance with all reporting obligations.

3. Please list each new program implemented by the agency during FY16 and FY17, to date. For each initiative please provide:

    a. A description of the initiative;
    b. The funding required to implement to the initiative; and
    c. Any documented results of the initiative.

    See BEGA FY16 and FY17 Performance Plans (Exhibits 10 and 11).

4. How does the agency measure programmatic success? Please discuss any changes to outcomes measurement in FY16 and FY17, to date.

    See BEGA FY16 and FY17 Performance Plans (Exhibits 10 and 11).

5. Please list the task forces and organizations of which the agency is a member.

    BEGA is a member of the Council on Government Ethics Laws (COGEL), which is a private organization the membership of which is comprised of government entities similar to BEGA from all 50 States and the District of Columbia.

6. Please explain the impact on your agency of any legislation passed at the federal level during FY16 and FY17, to date, which significantly affected agency operations. If regulations are the shared responsibility of multiple agencies, please note.

    Not applicable.

7. Please describe any steps the agency took in FY16 and FY17, to date, to improve the transparency of agency operations.

    The agency, which oversees the Office of Open Government, works closely with its Director to ensure transparency and Open Meeting Act compliance. Moreover, a website redesign and new hosting platform will allow much easier searchability of Ethics decisions, opinions and rules.

8. Please identify all electronic databases maintained by your agency, including the following:

    a. A detailed description of the information tracked within each system;
    b. The age of the system and any discussion of substantial upgrades that have been made or are planned to the system; and
    c. Whether the public can be granted access to all or part of each system.

    OGE oversees four electronic databases – the BEGA website, the Lobbyist Registration and Activity Report filing system, the Public Official Financial

Disclosure Statement filing system, and the Prolaw case docketing and tracking system.

The BEGA website is the central location for information concerning BEGA/OGE. It contains all Formal Advisory Opinions issued by the Office of Government Ethics, Board decisions with respect to enforcement actions, the quarterly complaint report and announcements such as news, trainings and other events. The BEGA website also provides instructions and forms for filing ethics complaints, and, importantly, links to the Lobbyist and FDS databases. The website is also where the Ethics Manual, the Code of Conduct and the several Best Practices Reports reside.

The Lobbyist Registration and Activity Report Filing system is a database that is managed by OGE. The system allows Lobbyists to electronically register, pay the accompanying registration fee and, every 6 months, file the required activity reports. The activity reports contain information concerning all contacts lobbyists have had with government officials and the nature of those communications. The activity report also contains information concerning funds expended for lobbying activities and client information. As mentioned above, continuing upgrades have been necessary to keep the system functional given its age. A comprehensive upgrade is planned for FY 2017 and 18' with the goal of replacing the current system with one that will better serve both Lobbyists and members of the general public who frequently seek information concerning lobbyist activities.

The Financial Disclosure Filing system is the repository for all Public Financial Disclosure filings by public officials (certain high level employees as well as elected officials). It was recently upgraded to allow filers to more easily comply with financial disclosure filing requirements. This included additional simplification of the questions contained on the Financial Disclosure standard form. Questions were rephrased and simplified, and excess verbiage deleted, without losing required information. Initial testing has been very positive. Importantly, this short term fix does not obviate the need for the aforementioned replacement of the entire e-filing system insofar as it is the same obsolete computer code.

Finally, BEGA also uses ProLaw, an electronic database system, to manage and track all incoming cases. The system provides online document storage and sharing, court docketing, email, legal calendaring, document assembly and contacts. It is a law office style docketing system also utilized by the Office of the Attorney General. It is not accessible to the public nor are there plans to make it so.

9. Please provide a detailed description of any new technology acquired in FY16 and FY17, to date, including the cost, where it is used, and what it does. Please explain if there have there been any issues with implementation.

There has been no new technology acquired.

10. Please provide the Committee with a brief summary of advisory opinions issued during FY16 and FY17, to date, along with a notation as to whether the opinion was requested or issued *sua sponte*.

Date	***File No.***	***Source***	***Description***
Feb. 4, 2016	1448-001	Sua sponte	Discusses the meaning of the Phrase "Devoted Substantially" in DPM § 1807.4
June 7, 2016	1043-005	Request	Request for Opinion Regarding Potential Conflict of Interest and Request for Waiver of Any Potential Conflict
June 14, 2016	1009-010	Request	Response to Request for Opinion Regarding Statehood Related Activities
Sept. 9, 2016	1531-001	Request	Discusses whether an employee participated personally and substantially in a particular matter involving specific parties prior to his departure from the District government within the meaning of DPM §§ 1811.3 and 1811.4
Sept. 24, 2016	1009-013	Request	Response to Request by Former Councilmember for Opinion Regarding Post-Employment Restrictions
Nov. 29, 2016	1583-001	Request	Response to Request by former DHCD and DMPED employee for Opinion Regarding Post-Employment Restrictions
Dec. 1, 2016	1566-001	Request	Response to Request for Advisory Opinion Regarding Statehood Activities by D.C. Office of Cable Television, Film, Music and Entertainment Employees
Jan. 29, 2016	1559-001	Sua Sponte	Discusses the application of the District's Code of Conduct to employee's use of social media.

11. Please inform the Committee whether BEGA received any complaints from the public alleging Open Meetings Act violations.

No complaints have been received concerning Open Meeting Act violations.

a. Has your agency initiated any suits in Superior Court regarding the Open Meetings Act?

See Office of Open Government response to this question (submitted separately).

b. Has your agency provided any advisory opinions on the Open Meetings Act?

These are issued by the Office of Open Government, which has filed separate responses to these oversight questions.

12. How many lobbyists are currently registered with BEGA?

In FY17 291 so far.

a. Out of the total number of registered lobbyists, how many filed their bi-annual activity reports in January 2016, July 2016, and January 2017?

   i. January 2017 – 372 reports filed (1 not filed)
   ii. July 2016 – 355 reports filed (3 reports not filed)
   iii. January 2016 – 373 reports filed (22 reports not filed)

b. Out of those who did not file, what penalties did BEGA assess?

   i. January 2017: $1,330
   ii. July 2016: $2,840
   iii. January 2016: $11,710

c. Of the total amount of penalties assessed, how much has been recovered?

   i. January 2017: $1,330
   ii. July 2016: $1,230
   iii. January 2016: $5,980

d. How much did BEGA receive in lobbyist registration fees in FY16 and FY17, to date?

   i. 2017: Total registration fees - $59,500
      1. For Profit: 225 registered lobbyists- $56250
      2. Non-Profit: 66 registered lobbyists - $3300
   ii. 2016: Total:$85650
      1. For Profit: 322 registered lobbyists - $80500
      2. Non-Profit: 103 registered lobbyists - $5150

13. How many ethics trainings did BEGA conduct in FY16 and FY17, to date? How many FOIA and open government trainings?

Ethics Trainings:

FY16	***FY17***
128	28 (to Dec. 31)

14. How many ethics complaints did the agency receive in FY16 and FY17, to date? Please break down the complaints by subject matter, if possible, as well as by time and outcome of any resolution.

FY16	***FY17***
138	14 (to Dec. 31)

See EXHIBIT 17 – BEGA FY16 Complaint Report.

See EXHIBIT 18 – BEGA FY17 Complaint Report.

Thank you, and please let me know if you have any questions or require any additional information. I may be contacted by telephone (202) 481-3411, or by email darrin.sobin@dc.gov.

Sincerely,

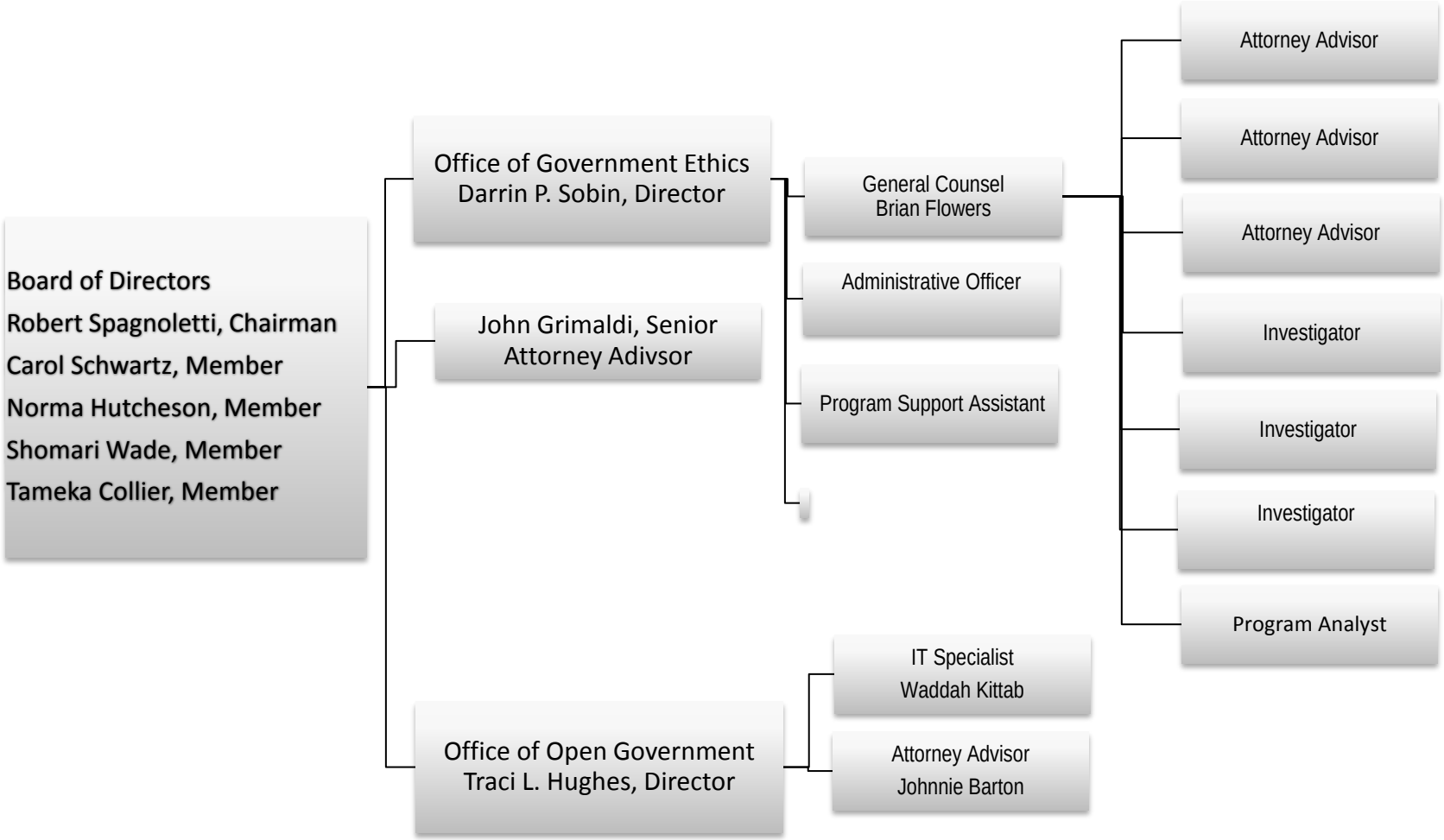
_____

Darrin P. Sobin
Director, Office of Government Ethics
Board of Ethics and Government Accountability

Enclosures

EXHIBIT 1

Committee on the Judiciary
BEGA Oversight Hearing/February 23, 2017



Board of Ethics and Government Accountability (BEGA)
Organization Chart – As of 2.15.17

EXHIBIT 2

BEGA Schedule A (AG0)

Posn Stat	Posn Nbr	Title	Name	Emplid	Reg/Temp	Hire Date	Vac Stat	Salary	F.Benefit	Total	Fund Code	Index	PCA
A	00077797	Director of Open Government	Hughes,Traci L	00013689	Reg	4/22/2013	F	163,086.21	34,248.10	197,334.31	0100	20001	20001
A	00083174	IT Specialist (Data Mgmt)	Kittab,Waddah	00086381	Reg	6/15/2015	F	79,077.00	16,606.17	95,683.17	0100	20001	20001
A	00086144	Attorney Advisor	Barton,Johnnie	00090189	Reg	2/8/2016	F	82,472.00	17,319.12	99,791.12	0100	20001	20001
A	00077471	Director of Government Ethics	Sobin,Darrin P	00014181	Reg	12/1/2003	F	173,891.00	36,517.11	210,408.11	0100	2010L	20100
A	00077482	General Counsel	Flowers,Brian K	00014096	Reg	3/9/2015	F	155,952.30	32,749.98	188,702.28	0100	2010L	20100
A	00077612	Investigator	Olawunmi,Clara O	00071477	Reg	1/28/2013	F	64,160.00	13,473.60	77,633.60	0100	2010L	20100
A	00077614	Investigator	Cook Sr.,Ronald J	00071555	Reg	2/11/2013	F	59,249.00	12,442.29	71,691.29	0100	2010L	20100
A	00077645	Attorney Advisor	Chounoune,Rudy	00091025	Reg	5/16/2016	F	98,444.00	20,673.24	119,117.24	0100	2010L	20100
A	00077645	Attorney Advisor	Foster,Janet	00093088	Reg	9/6/2016	F	103,728.00	21,782.88	125,510.88	0100	2010L	20100
A	00077729	Program Support Assistant	Dow,Tyrell H	00071453	Reg	10/20/2015	F	48,562.00	10,198.02	58,760.02	0100	2010L	20100
A	00078130	Senior Attorney Advisor	Grimaldi,John J	00002565	Reg	3/1/1999	F	170,705.81	35,848.22	206,554.03	0100	2010L	20100
A	00085318	Program Analyst	Dillion,Jessica	00089748	Reg	12/28/2015	F	56,852.00	11,938.92	68,790.92	0100	2010L	20100
A	00085319	Investigator	Corrales,Ileana C.	00037872	Reg	2/4/2008	F	91,438.00	19,201.98	110,639.98	0100	2010L	20100
A	00087514	Attorney Advisor	Cooks,Ashley	00088807	Reg	10/5/2015	F	79,810.00	16,760.10	96,570.10	0100	2010L	20100
A	00087567	Admin. Officer	Peterson,Sandra D.	00037339	Reg	11/26/2007	F	86,244.00	18,111.24	104,355.24	0100	2010L	20100
A	00091999	Attorney Advisor	Stewart-Mitchell,Asia	00095582	Temp	12/27/2016	F	79,810.00	16,760.10	96,570.10	0100	2010L	20100

BEGA FY16 and FY17 Intra-District Transfers

EXHIBIT 3

FY 2016 Transferred From BEGA			
Amount	***From***	***To***	***Description***
$ 1,582.50	AG0	KT0	Fleet Services
$ 650.00	AG0	TO0	RTS Telephone

FY 2017 Transferred From BEGA			
Amount	***From***	***To***	***Description***
$ 1,987.00	AG0	KT0	Fleet Services
$ 32,430.88	AG0	TO0	Services Server/Data Base
$ 1,000.00	AG0	TO0	RTS Telephone

BEGA FY16 and FY17 Special Purpose Revenue

EXHIBIT 4

Revenue Source Name	Code	Source of Funding	Statutory Reference	About the Fund			FY16 Budget	FY17 Budget	Amount Generated		Expenditures	
				Description	Fee and How it is Set	Who Pays?			FY16 (actual)	FY17 (YTD) as of Feb 2017	FY16 (Actual)	FY17 (as of 2/6/2017)
Fines	0601	0600 - O-Type	D.C.Official Code sec. 1-1162.10.	Revenue from this fund comes from fines imposed by the Board.	Fees are set by the Board.	DC Government employees and lobbyist.	$ 60,000.00	$ 60,000.00	$ 22,635.00	$ 4,060.00	$ 28,437.62	$ -
Lobbyist Registration	0602	600 - O-Type	D.C. Official Code 1-1162.27.	Revenue from this fund comes from lobbyist registration fees.	Registration fees are $250 for profit firms and $50 for non-profit firms.	Lobbyist firm (client), and/or lobbyist hired to work on behalf of the client.	$ 90,000.00	$ 90,000.00	$ 88,840.00	$ 70,610.00	$ 77,208.99	$ -

BEGA FY16 Purchase Card Expenditure Report

EXHIBIT 5

Vendor Name	Employee Making Expenditure	Expenditure Amount	General Purpose for Expenditure Services provided
Standard Office Supply	Tyrell Dow	$261.68	Provides general office supplies.
LexisNexis	Tyrell Dow	$400.00	Provides legal search services.
D.C. Bar	Tyrell Dow	$99.00	Statute and Regulation Drafting Series
Standard Office Supply	Tyrell Dow	$115.47	Provides general office supplies.
Amazon	Tyrell Dow	$115.00	Ordered a Administrative Law books to assist attorneys.
Standard Office Supply	Tyrell Dow	$24.36	Provides general office supplies.
Standard Office Supply	Tyrell Dow	$81.59	Provides general office supplies.
Comcast	Tyrell Dow	$65.31	Provides cable television services
Comcast	Tyrell Dow	$65.31	Provides cable television services
D.C. Bar	Tyrell Dow	$319.00	Registration for Ashley Cooks to attend D.C. Bar Trial Skills Clinic
D.C. Bar	Tyrell Dow	($79.00)	Refund for cancelled training for Traci Hughes course on Statute and Regulation Drafting Series
Standard Office Supply	Tyrell Dow	$172.20	Purchase of general office supplies
Softchoice	Tyrell Dow	$799.96	Provides website maintenance and design
Standard Office Supply	Tyrell Dow	$172.20	Provides general office supplies.
SAP Store	Tyrell Dow	$523.46	Provides support to the Financial Disclosure online system
Senoda	Tyrell Dow	$84.00	Provides business cards for Ashley Cooks
Metro	Tyrell Dow	$200.00	Provides local transportation.
Standard Office Supply	Tyrell Dow	$201.55	Provides general office supplies.
Amazon	Tyrell Dow	$19.87	Provides "Plain English for Lawyers" book for the attoneys

BEGA FY16 Purchase Card Expenditure Report

Veritas Consulting Group	Tyrell Dow	$590.00	Reinstalled the intercom for the entrance to the reception desk.
LexisNexis	Tyrell Dow	$680.00	Provides legal search services.
Comcast	Tyrell Dow	$65.31	Provides cable television services
Comcast	Tyrell Dow	$65.31	Provides cable television services
Center for Creative Leadership	Tyrell Dow	$3,488.00	Registration for Sandra Peterson to attend " Maximizing Your Leadership Potential" training
LawProse	Tyrell Dow	$395.00	Registration for Ashley Cooks to attend "Advanced Legal Writing & Editing" training
LawProse	Tyrell Dow	$395.00	Registration for Cristina Patzelt to attend "Advanced Legal Writing & Editing" training
Lawprose	Tyrell Dow	$199.00	Registration for Ashley Cooks to attend "Write Readable Sentences" webinar
LawProse	Tyrell Dow	$199.00	Registration for Ashley Cooks to attend "Write Sound Paragraphs" webinar
LawProse	Tyrell Dow	$199.00	Registration for Cristina Patzelt to attend "Write Sound Paragraphs" webinar
Southwest Airlines	Sandra Peterson	$143.00	Flight reservations for Deborah Lathen to attend 2015 COGEL Conference
Southwest Airlines	Sandra Peterson	$128.00	Flight reservations for Brian Flowers to attend 2015 COGEL Conference
Southwest Airlines	Sandra Peterson	$98.02	Flight reservations for Darrin Sobin to attend 2015 COGEL Conference
Council on Government Ethics Laws	Sandra Peterson	$1,160.00	Council on Government Ethics Laws Conference
Center for Creative Leadership	Sandra Peterson	$3,488.00	Registration for Darrin Sobin to attend Center for Creative Leadership Conference
Delta	Sandra Peterson	$1,445.00	Flight reservation for Traci Hughes to attend conference in Spain.
Amazon	Sandra Peterson	$24.94	Purchase of office equipment/supplies.
Amazon	Sandra Peterson	$5.45	Purchase of office equipment/supplies.
Amazon	Sandra Peterson	$7.99	Purchase of office equipment/supplies.
John E. Reid	Sandra Peterson	$770.00	Interview and interrogation technique training.

BEGA FY16 Purchase Card Expenditure Report

Metro	Sandra Peterson	$200.00	Vendor provides metro bus/rail transportation services.
Metro	Sandra Peterson	$200.00	Vendor provides metro bus/rail transportation services.
Media Temple	Sandra Peterson	$500.00	Web hosting service
DOTGOV	Sandra Peterson	$125.00	Provides domain name
DOTGOV	Sandra Peterson	$125.00	Provides domain name
Council on Government Ethics Laws	Sandra Peterson	$625.00	Registration for Darrin Sobin and Brian Flowers to attend 2015 COGEL Conference
Standard Office Supply	Sandra Peterson	($15.44)	Vendor provides standard office supplies.
Standard Office Supply	Sandra Peterson	$66.35	Vendor provides standard office supplies.
Metro	Sandra Peterson	$100.00	Vendor provides metro bus/rail transportation services.
Standard Office Supply	Sandra Peterson	$95.24	Vendor provides standard office supplies.
Comcast	Sandra Peterson	$62.69	Vendor provides cable television services
LexisNexis	Sandra Peterson	$340.00	Legal searching services
Fairmont Copley Plaza	Sandra Peterson	$594.00	Hotel stay for Deborah Lathen at 2015 COGEL Conference
Fairmont Copley Plaza	Sandra Peterson	$792.00	Hotel stay for Darrin Sobin for 2015 COGEL Conference
Fairmont Copley Plaza	Sandra Peterson	$792.00	Hotel stau for Brian Flowers for 2015 COGEL Conference
Standard Office Supply	Sandra Peterson	$107.52	Vendor provides standard office supplies.
Comcast	Sandra Peterson	$62.69	Vendor provides cable television services
Southwest Airlines	Sandra Peterson	$64.98	Flight reservation for Deborah Lathen(flight change)
Standard Office Supply	Sandra Peterson	$203.53	Vendor provides standard office supplies.
Marriott Hotel	Sandra Peterson	$486.36	Provides hotel stay for conference
Thomson Reuters	Sandra Peterson	$441.00	DC Code Renewal
LexisNexis	Sandra Peterson	$400.00	Legal searching services
Standard Office Supply	Tyrell Dow	$90.25	Purchase of general office supplies.
Comcast	Tyrell Dow	$65.31	Provides cable television services.

BEGA FY16 Purchase Card Expenditure Report

Comcast	Tyrell Dow	$65.31	Travel reservation for Brian Flowers to attend COGEL CONFERENCE IN Boston, MA
Standard Office Supply	Tyrell Dow	$24.60	Purchase of name plate for Board Room.
D.C. Bar	Tyrell Dow	$229.00	Registration for Ashley Cooks to attend "D.C. Rules of Professional Conduct" training.
A Digital Solutions	Tyrell Dow	$250.00	Repaired a broken scanner.
Standard Office Supply	Tyrell Dow	$376.98	Purchase of conference room table.
Standard Office Supply	Tyrell Dow	$281.98	Purchase of Board Room table.
Global Print Master	Tyrell Dow	$520.00	Purchase of business cards for Traci Hughes.
Marriott Hotel	Tyrell Dow	$536.70	Hotel resercations for Sandra Peterson to attend Center for Creative Leadership.
Standard Office Supply	Tyrell Dow	$272.98	Purchase of printer for new employee.
Standard Office Supply	Tyrell Dow	$910.07	Purchase of toner for printer.
Standard Office Supply	Tyrell Dow	$159.57	Purchase of general office supplies.
Standard Office Supply	Tyrell Dow	$231.76	Purchase of general office supplies.
Metro Stamp and Seal	Tyrell Dow	$70.45	Purchase of Notary package for Ileana Corrales.
Dell Corp.	Tyrell Dow	$329.98	Purchase of monitor for new employee.
North Capitol Partners	Tyrell Dow	$328.00	Transport of old furniture to surplus.
Amazon	Tyrell Dow	$29.01	Purchase "Garner's Modern Usage" book.
LexisNexis	Tyrell Dow	$415.99	Provides legal search services.
LexisNexis	Tyrell Dow	$340.00	Provides legal search services.
Comcast	Tyrell Dow	$65.31	Provides cable television services.
Comcast	Tyrell Dow	$65.31	Provides cable television services.
Dell Corp.	Tyrell Dow	$1,135.03	Purchase of a new compouter for new employee.
LexisNexis	Tyrell Dow	$1,800.00	Payment of past due blanace.
Comcast	Tyrell Dow	$65.31	Provides cable television services.
Comcast	Tyrell Dow	$65.31	Provides cable television services.
LexisNexis	Tyrell Dow	$416.00	Provides legal search services.
Amazon	Tyrell Dow	$39.47	Purchase of new keyboard to replace old/broken one.
Amazon	Tyrell Dow	$31.91	Purchase of new keyboard to replace old/broken one.

BEGA FY16 Purchase Card Expenditure Report

Amazon	Tyrell Dow	$89.00	Purchase of screen protectors and phone cases for new work phones.
Advance Employee Intelligence	Tyrell Dow	$912.00	Tempoary Staffer to assist with FDS project
Amazon	Tyrell Dow	$9.95	Purchase of belt phone clip for Director Sobin.
Standard Office Supply	Tyrell Dow	$21.51	Purchase of usb drive.
Amazon	Tyrell Dow	($39.05)	Refund for wrong size screen protectors.
LexisNexis	Tyrell Dow	$416.00	Provides legal search.
Comcast	Tyrell Dow	$65.31	Provides cable television services.
Comcast	Tyrell Dow	$65.31	Provides cable television services.
LexisNexis	Tyrell Dow	$340.00	Provides legal search services.
Advance Employee Intelligence	Tyrell Dow	$1,026.00	Tempoary Staffer to assist with FDS project
COGEL	Tyrell Dow	$445.00	Membership dues for Yancey Burns.
Standard Office Supply	Tyrell Dow	$81.59	Purchase of toner for printer.
University of the District of Columbia	Tyrell Dow	$700.00	Payment for space to hold our retreat.
Amazon	Tyrell Dow	$41.97	Ipad keyboards for OIG training.
Standard Office Supply	Tyrell Dow	$1,364.05	Purchase of printer toner.
LexisNexis	Tyrell Dow	$416.00	Provides legal search services.
LexisNexis	Tyrell Dow	$340.00	Provides legal search services.
Alpha Graphics	Tyrell Dow	$1,941.31	Provides Ethics Manuals.
Comcast	Tyrell Dow	$65.31	Provides cable television services.
Comcast	Tyrell Dow	$65.31	Provides cable television services.
One Source Process	Tyrell Dow	$65.00	Provided supeona services.
Senoda	Tyrell Dow	$315.00	Provided BEGA stamped envelopes.
LexisNexis	Tyrell Dow	$416.00	Provide legal search services.
LexisNexis	Tyrell Dow	$416.00	Provides legal search services.
StockLayouts	Tyrell Dow	$99.00	Provided stock layout to creat Office of Open Government brochure.
LexisNexis	Tyrell Dow	$340.00	Provides legal search services.
Thomson Reuters	Tyrell Dow	$1,151.00	DC code renewal.
Standard Office Supply	Tyrell Dow	$33.91	Purchase of trash bags for shredding machine.

BEGA FY16 Purchase Card Expenditure Report

Comcast	Tyrell Dow	$130.62	Provide cable television services. (Aug & Sept invoices)
Trice Talent Services	Tyrell Dow	$1,185.00	Provided the actor for our commercial.
	Total =	**$45,284.59**	

BEGA FY17 Purchase Card Expenditure Report (1st Quarter)

EXHIBIT 6

Vendor Name	Employee Making Expenditure	Expenditure Amount	General Purpose for Expenditure
LexisNexis	Tyrell Dow	$340.00	Provides legal search services.
DataNet	Tyrell Dow	($275.63)	Refund for being overcharged.
DataNet	Tyrell Dow	$275.63	Provides lobbyist e-filing support and maintenance.
DataNet	Tyrell Dow	$275.63	Double charged. Refund was issued.
Senoda	Tyrell Dow	$164.00	Purchase of Business cards for two new employees.
Standard Office Supply	Tyrell Dow	$49.20	Purchase of name plates for new board members.
Thomson Reuters	Tyrell Dow	$2,403.23	Purchase of D.C. Codes.
Standard Office Supply	Tyrell Dow	$1,164.80	Purchase of toner for printer.
Standard Office Supply	Tyrell Dow	$131.58	Purchase of printing paper and legal pads.
Standard Office Supply	Tyrell Dow	$145.79	Purchase of scanner for new Attorney.
Standard Office Supply	Tyrell Dow	$33.63	Purchase of legal pads.
DOTGOV	Tyrell Dow	$125.00	Registration of domain names.
Standard Office Supply	Tyrell Dow	$265.64	Purchase of black toner.
Armstrong Custom Signs	Tyrell Dow	$455.00	Purchase of an Board of Ethics banner.
Council on Government Ethics	Tyrell Dow	$1,740.00	Registration for Darrin Sobin, Brian Flowers, and John Grimaldi to attend COGEL Conference.
Graduate School	Tyrell Dow	$699.00	Registration for Clara Olawunmi to attend Audit Evidence training.
Standard Office Supply	Tyrell Dow	$693.82	Purchae of chair for employee with special needs.
One Source Process	Tyrell Dow	$130.00	Payment for two subpoenas served.
American Airlines	Tyrell Dow	$280.20	Flight reservations for Darrin Sobin to attend COGEL Conference.
American Airlines	Tyrell Dow	$280.20	Flight reservations for John Grimaldi to attend COGEL Conference.
American Airlines	Tyrell Dow	$280.20	Flight reservations for Brian Flowers to attend COGEL Conference.
One Source Process	Tyrell Dow	$130.00	Payment to serve subpoena's on behalf of BEGA.
DOTGOV	Tyrell Dow	$125.00	Purchase of Domain name.
Comcast	Tyrell Dow	$65.31	Provides cable television services.
Comcast	Tyrell Dow	$65.31	Provides cable television services.
LexisNexis	Tyrell Dow	$340.00	Provides legal search services.
LexisNexis	Tyrell Dow	$416.00	Provides legal search services.
Standard Office Supply	Tyrell Dow	$1,399.14	Purchase of board room chairs.

BEGA FY17 Purchase Card Expenditure Report (1st Quarter)

Thomson Reuters	Tyrell Dow	$459.00	Provides DC Codes.
Comcast	Tyrell Dow	$65.31	Provides cable television services.
LexisNexis	Tyrell Dow	$416.00	Provides legal search services.
Comcast	Tyrell Dow	$65.31	Provides cable television services.
Marriott	Tyrell Dow	$680.90	Hotel reservation for Darrin Sobin (overcharge; awaiting refund.
Marriott	Tyrell Dow	$634.72	Hotel reservation for John Grimaldi to attend COGEL conference.
Marriott	Tyrell Dow	$634.72	Hotel reservations for Brian Flowers to attend COGEL conference.
	Total	**$15,153.64**	

BEGA FY16 and FY17 Memoranda of Understanding (MOU)

EXHIBIT 7

MOU FY 2016 Transferred From BEGA (AG0)			
Amount	**From**	**To**	**Description**
$ 1,582.50	AG0	KT0	Fleet Services
$ 650.00	AG0	TO0	RTS Telephone

MOU FY 2017 Transferred From BEGA (AG0)			
Amount	**From**	**To**	**Description**
$ 1,987.00	AG0	KT0	Fleet Services
$ 32,430.88	AG0	TO0	Services Server/Data Base
$ 1,000.00	AG0	TO0	RTS Telephone

BEGA FY16 and FY17 Budget Enchancement Requests

EXHIBIT 8

Year	Description	Amount	FTE's
2016	To support a new Attorney Advisor & Ethics Trainer; Increase to cover compensation for Board Member and for Website	$ 129,853.00	2

Year	Description	Amount	
2017	To support stipends for 5 Board positions and operations; support day-to-day NPS functions; support OCTO's charge for IT services in the amount of $32,431.14 (that amount was taken from PS, but will have to be restored to support the salary of needed administrative support position	$172.216.14	

BEGA FY16 and FY17 Reprogramming

EXHIBIT 9

FY 2016 Reprogramming

From	Amount	TO	Amount	DESCRIPITION
0040	30,000.00	0111	23,700.00	Operational Cost within the agency
		0147	6,300.00	Fund O-Type Revenue Sept 15,16
Total	**30,000.00**		**30,000.00**	

NO FY 2017 Reprogramming

District of Columbia Planning Documents

Performance Plans | D.C. Board of Ethics and Govern...

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Home | Agencies | Performance Plans | Objectives | Operations List | Operations-Strategic Obje... | STRATEGIC INITIATIVES | Initiatives | Measures | Initi

Return

Agency D.C. Board of Ethics and Government Accountability **Agency Acronym** BEGA **Agency Code** AG0

To edit agency and POC information press your agency name (underlined and in blue above).

Agency Performance POCs Brian (EOM) Flowers Darrin (OAG) Sobin Sandra Peterson **Agency Budget POCs** Mohammad Awan Sandra Peterson **Fiscal Year** 2016

When you believe you are finished with this phase of your Performance Plan, press edit in the upper right, check this box, and then press save.

2016 Objectives

Strategic Objectives: What we want to do for the District

Full Report | Grid Edit | Email | More 3 Objectives

Division/Department	Objective Number	Objective Description
Office of Government Ethics (OGE) (3 Objectives)		
Office of Government Ethics (OGE)	1	OGE will conduct timely and appropriate investigations and enforcement actions.
Office of Government Ethics (OGE)	2	OGE will conduct mandatory training on the Code of Conduct and produce ethics training materials.
Office of Government Ethics (OGE)	3	OGE will issue informal ethics advice in an expedited and consistent fashion.

2016 Key Performance Indicators

Click the link below for a "Blank KPI spreadsheet." You can use this to directly enter data by selecting Grid Edit. You can also use this to create an excel document to collect data. Select More in the upper right and Save as a Spreadsheet for a sharable excel spreadsheet to collect data. The calculated formulas are currently being tested, which is why you see extra data columns. Please check that they are calculating as you would expect.

Blank KPI spreadsheet

Performance Plan Measures (FY16 KPIs) Linked to Specific Objective

Full Report | Grid Edit | Email | More 3 Measures

Performance Plan Metrics	Division	Frequency of Reporting	Measure	Current Fiscal Year Target	FY 2013	FY 2014	FY 2015	Q1FY2016	Q2FY2016	Q3FY2016	Q4FY2016	FY 2016	Was KPI Met?
1 - OGE will conduct timely and appropriate investigations and enforcement actions. (1 Measure)													
Key Performance Indicator		Quarterly	Percent of investigations resolved by dismissal, negotiated disposition, or issuance of Notice of Violation within 120 days of initiation	80				63.64	78.95	94.44	100	83.3%	Met
2 - OGE will conduct mandatory training on the Code of Conduct and produce ethics training materials. (1 Measure)													
Key Performance Indicator		Quarterly	Percent of final Ethics Board orders issued within 45 days of close of hearing record	85				100	100	100	100	100%	Met
3 - OGE will issue informal ethics advice in an expedited and consistent fashion. (1 Measure)													
Key Performance Indicator		Quarterly	Percent of formal written Advisory Opinions issued within 30 days of receipt of complete information from requestor.	85		69.23	100	100		100	100	100%	Met

Comments/Footnotes

All KPIs must be linked to a specific Objective. If KPIs are already entered without a link to an objective (appearing below) email the Office of Performance Management with a spreadsheet that shows to which Objectives the KPIs should be linked.

Performance Plan Measures (FY16 KPIs) Not Linked to Specific Objective

Performance Plan Metrics	Division	Frequency of Reporting	Measure	Current Fiscal Year Target	Long-Term Target (if different)	FY 2013	FY 2014	FY 2015	Q1FY2016	Q2FY2016	Q3FY2016
No measures found											

2016 Workload Measures

Click the link below for a "Blank Workload Measures spreadsheet." You can use this to directly enter data by selecting Grid Edit. You can also use this to create an excel document to collect data. Select More in the upper right and Save as a Spreadsheet for a sharable excel spreadsheet to collect data. The calculated formulas are currently being tested, which is why you see extra data columns. Please check that they are calculating as you would expect.

Blank Workload Measure spreadsheet

Add Workload Measure (NOT KPI)

Full Report | Grid Edit | Email | More 13 Measures

	Performance Plan Metrics	Frequency of Reporting	Measure	Add Data FY16 PP	FY 2013	FY 2014	FY 2015	Q1FY2016	Q2FY2016	Q3FY2016	Q4FY2016	FY2016 Annual Total
Workload Measure (13 Measures)												
	Workload Measure	Quarterly	Number of preliminary investigations opened based on tips to the hotline			1	1	0	2	0	0	2
	Workload Measure	Quarterly	Number of preliminary investigations dismissed			19	12	9	9	10	6	34
	Workload Measure	Quarterly	Number of preliminary investigations opened based on information provided by means other than the hotline			32	46	10	34	21	20	85
	Workload Measure	Quarterly	Number of preliminary investigations converted to formal investigations			2	1	0	0	1	2	3
	Workload Measure	Quarterly	Number of preliminary investigations resolved with a negotiated disposition			6	13	6	3	3	5	17
	Workload Measure	Quarterly	Number of preliminary investigations resolved after an evidentiary hearing			1	0	0	0	0	0	0
	Workload Measure	Quarterly	Number of formal investigations initiated on intake			8	12	4	5	8	7	24
	Workload Measure	Quarterly	Number of formal investigations dismissed			10	7	3	4	8	2	17
	Workload Measure	Quarterly	Number of formal investigations resolved with a negotiated disposition			5	2	0	0	1	0	1
	Workload Measure	Quarterly	Number of formal investigations resolved after an evidentiary hearing			2	0	0	0	0	0	0
	Workload Measure	Quarterly	Number of formal written advisory opinions issued pursuant to a request			13	5	0	0	1	3	4
	Workload Measure	Quarterly	Number of formal written advisory opinions issued on the agency's own initiative				1	1	0	1	0	2
	Workload Measure	Quarterly	Number of request for informal ethics advice received from agency ethics officers and individual employees and public officials			511	681	172	212	121	185	690

2016 Initiatives

Full Report | Grid Edit | Email | More 6 Initiatives

	Initiative Number	Initiative Title	Initiative Description	# of Initiative Updates
Office of Government Ethics (OGE) - 1 (2 Initiatives)				
	1.2	Conduct a minimum of 10 Audit Style Reviews of Lobbyist Activity Reports.	OGE staff shall conduct a minimum of 10 Audit Style Reviews of Lobbyist Activity Reports. This will allow OGE to better fulfill its oversight functions of lobbyist activity.	1
	1.1	Hold joint monthly meetings with the staff of partner agencies such as the Office of the Inspector General.	The OGE will hold joint monthly meetings with the staff of partner agencies, such as the Office of the Inspector General, to discuss progress on shared cases and to ensure that the staff of each agency receives necessary guidance and feedback with respect to case management, coordination and development. Measurable success from one meeting to the next on shared cases will be expected and targets for investigation completion will be set.	1
TOT				2
Office of Government Ethics (OGE) - 2 (2 Initiatives)				
	1.1	Develop an automated online training module.	The OGE will develop an automated online training module that will reside on the BEGA website. The training module will allow District employees to remotely take a BEGA Ethics training class and receive certification of successful completion. The online training module will supplement the numerous ongoing live training programs currently conducted by OGE staff.	1
	1.2	Develop specialized trainings that focus on distinct ethics issues and client agencies.	The OGE will expand its training component to include specialized ethics trainings that will focus on distinct issues such as post-employment restrictions and political activity, as well as trainings customized for non-subordinate agencies of the government (i.e., Boards and Commissions, independent agencies and legislative branch employees). Shortened training programs will also be developed for use when BEGA is invited to make an ethics presentation as part of a larger meeting or program.	1
TOT				2
Office of Government Ethics (OGE) - 3 (2 Initiatives)				
	1.2	Create a database of informal ethics advice.	The OGE will create an internal database comprised of all informal advice previously provided. This will allow the legal staff to provide consistent advice and to identify trending issues that might warrant a formal advisory opinion.	1
	1.1	Institute a policy by which government employees receive a response to or acknowledgement of an ethics advice query either the same day or within 24 hours of the request being made.	The OGE will create a policy requiring office staff to respond to ethics queries from government employees on the same day or within 24 hours of receipt. The response may either be substantive or, if the query is too complex to provide a substantive response immediately, an acknowledgement that the issue is under review.	1
TOT				2
TOT				**6**

2016 Initiative Updates

Time Period	Division/Department	Initiative Title	Initiative Status Update	Status of Impact	Explanation of Impact	Proposed Completion Date	Confidence in completion by end of fiscal year (9/30)?	% Complete to date	Date Modified

No initiative updates found

Agency Accomplishments

Accomplishments Full Report | Grid Edit | Email | More 3 Accomplishments

What is the accomplishment that your agency wants to highlight?	How did this accomplishment impact residents of DC?	How did this accomplishment impact your agency?
Developed specialized trainings that focus on distinct ethics issues and client agencies. The OGE expanded its training component to include specialized ethics trainings that focused on distinct issues such as post-employment restrictions and political activity, as well as trainings customized for non-subordinate agencies of the government (i.e., Boards and Commissions, independent agencies and legislative branch employees). Shortened training programs were developed for use when BEGA is invited to make an ethics presentation as part of a larger meeting or program.	It is axiomatic that more training leads to a heightened awareness of ethical standards among District employees, and therefore fewer instances of ethical misconduct. The residents of the District not only received the intangible benefit of a more ethical government workforce, but also the actual monetary savings of fewer investigations and resulting enforcement proceedings. The cost of an investigation and enforcement proceeding far exceeds the cost of a training.	Focusing on a more robust training program, though time consuming, actually saved agency resources because there were fewer investigations that needed to be done. Investigations and enforcement proceeding are the biggest drain on agency resources because they require the services of all agency staff -- attorneys, investigators and administrative support staff. Trainings, on the other hand, only require approximately two hours of an attorney's time.
The agency created and populated an internal database comprised of all informal advice provided throughout the reporting period. This allowed the legal staff to provide consistent advice and to identify trending issues that might warrant a formal advisory opinion.	Providing ethics guidance to District employees and elected officials is one of the core functions of the agency and is a critical component of fostering high ethical standards for the District government. The database allows agency staff to quickly and consistently respond to advice queries from government employees. As a result, employees are more likely to seek advice prior to committing an act of questionable propriety. The residents of the District benefit when they have a government workforce that is both ethical and accountable. There is also a realized monetary savings when advice is provided because an ethics violation is much less likely to occur, thereby saving the cost of an investigation and possible enforcement proceeding.	This accomplishment was a great benefit to the agency because it reduced the learning curve for new attorneys when confronted with an ethics query. Prior to implementation of this database, the agency relied on the institutional knowledge of its attorneys but that knowledge was lost whenever an attorney left the agency (three new attorneys were hired during the reporting period). The database allows the agency to rapidly respond to ethics queries and to provide consistent ethics advice on similar issues.
The agency held joint monthly meetings during the reporting period with the staff of the Office of the Inspector General, to discuss progress on shared cases and to ensure that the staff of each agency received necessary guidance and feedback with respect to case management, coordination and development. Measurable progress from one meeting to the next on shared cases was an expectation that was achieved.	The residents of the District received the benefit of having two oversight agencies with some overlapping responsibilities coordinate in a way that ensured the efficient expenditure of government resources. This was achieved because duplication of efforts by the two agencies was all but eliminated.	The coordination was a benefit to this agency because, with limited resources, the agency was able to maximize its available assets to focus only on those matters that were not handled by the better staffed and funded Office of the Inspector General (OIG). The agency was able to capitalize on the investigatory work of the OIG without itself having to expend resources on many investigations.

2016 Special Mayoral Plans

Initiative Title	Initiative Description	Special Mayoral Plan	Mayoral Plan Domain	Mayoral Plan Goal	Mayoral Plan Action

No links to special mayoral plans found

2016 Linked Goals

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District Priority Goal	Priority Area	Initiative Title
Create a database of informal ethics advice. (1 Initiative/Goal Link)		
	Excellence in Government	Create a database of informal ethics advice.
Develop an automated online training module. (1 Initiative/Goal Link)		
	Excellence in Government	Develop an automated online training module.
Develop specialized trainings that focus on distinct ethics issues and client agencies. (1 Initiative/Goal Link)		
	Excellence in Government	Develop specialized trainings that focus on distinct ethics issues and client agencies.
Institute a policy by which government employees receive a response to or acknowledgement of an ethics advice query either the same day or within 24 hours of the request being made. (1 Initiative/Goal Link)		
	Excellence in Government	Institute a policy by which government employees receive a response to or acknowledgement of an ethics advice query either the same day or within 24 hours of the request being made.

Administrative Information

FY Performance Plan D.C. Board of Ethics and Government Accountability FY2016 **Record ID#** 142

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District of Columbia Planning Documents

Performance Plans

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Agency D.C. Board of Ethics and Government Accountability

Agency Acronym BEGA

Agency Code AG0

To edit agency and POC information press your agency name (underlined and in blue above).

Agency Performance POCs Brian (EOM) Flowers, Darrin (OAG) Sobin, Sandra Peterson

Agency Budget POCs Mohammad Awan, Sandra Peterson

Fiscal Year 2017

When you believe you are finished with this phase of your Performance Plan, press edit in the upper right, check this box, and then press save.

2017 Strategic Objectives

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Objective Number	Strategic Objective
1	Issue Ethics advice in an expeditious and consistent fashion.
2	Conduct timely and appropriate investigations and enforcement actions.
3	Conduct mandatory training on the Code of Conduct and produce ethics training materials.
4	Create and maintain a highly efficient, transparent and responsive District government.**

2017 Key Performance Indicators

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Measure	New Measure/ Benchmark Year	Frequency of Reporting	Add Data Fields (if applicable)	FY 2014 Actual	FY 2015 Target	FY 2015 Actual	FY 2016 Target	FY 2016 Actual	FY 2017 Target	FY 2017 Quarter 1

1 - Issue Ethics advice in an expeditious and consistent fashion. (3 Measures)

Measure	New Measure/ Benchmark Year	Frequency of Reporting	Add Data Fields (if applicable)	FY 2014 Actual	FY 2015 Target	FY 2015 Actual	FY 2016 Target	FY 2016 Actual	FY 2017 Target	FY 2017 Quarter 1
Percent of advice queries received that were handled as informal rather than formal advice.	✔	Quarterly		Not available	Not available	Not available	Not available	New Measure	80%	95%
Percent of formal written Advisory Opinions appealed to the Ethics Board.	✔	Quarterly		Not available	Not available	Not available	Not available	New Measure	10%	0%
Percent of formal written Advisory Opinions issued within 30 days of receipt of complete information from requester.	✔	Quarterly		100%	75%	100%	80%	New Measure	85%	100%
2 - Conduct timely and appropriate investigations and enforcement actions. (3 Measures)										
Percent of investigations resolved by dismissal, negotiated disposition, or issuance of Notice of Violation within 120 days of initiation.	✔	Quarterly		Not available	Not available	Not available	65%	New Measure	80%	68.75%
Percent of enforcement actions that result in a sanction.	✔	Quarterly		Not available	Not available	Not available	Not available	New Measure	85%	100%
Percent of final Ethics Board Orders issued within 45 days of close of hearing record.	✔	Quarterly		Not available	Not available	Not available	80%	New Measure	85%	100%
3 - Conduct mandatory training on the Code of Conduct and produce ethics training materials. (3 Measures)										
Percent of evaluations completed by attendees with an overall positive rating of "3" or higher on the BEGA training evaluation form.	✔	Quarterly		Not available	Not available	Not available	Not available	New Measure	80%	100%
Percent of off site agency training requests granted	✔	Quarterly		Not available	Not available	Not available	Not available	New Measure	90%	100%
Percent of agency trainings held within 90 days of agency making the request.	✔	Quarterly		Not available	Not available	Not available	Not available	New Measure	90%	100%
4 - Create and maintain a highly efficient, transparent and responsive District government. (9 Measures)**										

Measure	New Measure/ Benchmark Year	Frequency of Reporting	Add Data Fields (if applicable)	FY 2014 Actual	FY 2015 Target	FY 2015 Actual	FY 2016 Target	FY 2016 Actual	FY 2017 Target	FY 2017 Quarter 1
Contracts/Procurement- Expendable Budget spent on Certified Business Enterprises	✔			Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017
Contracts/Procurement- Contracts lapsed into retroactive status	✔			Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017
Budget- Local funds unspent	✔			Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017
Budget- Federal Funds returned	✔			Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017
Customer Service- Meeting Service Level Agreements	✔			Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017
Human Resources- Vacancy Rate	✔			Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017
Human Resources- Employee District residency	✔			Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017
Human Resources- Employee Onboard Time	✔			Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017
Performance Management- Employee Performance Plan Completion	✔			Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017

2017 Operations

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Operations Header	Operations Title	Operations Description	Type of Operations	# of Measures	# of Strategic Initiatives
1 - Issue Ethics advice in an expeditious and consistent fashion. (1 Activity)					
BOARD OF ETHICS	Render Timely Advice. Respond to requests for informal ethics advice in a substantive and useful manner.	Work with staff to ensure that ethics guidance is provided to government employees who seek ethics guidance.	Daily Service	3	2
TOT				3	2
2 - Conduct timely and appropriate investigations and enforcement actions. (1 Activity)					

	Operations Header	Operations Title	Operations Description	Type of Operations	# of Measures	# of Strategic Initiatives
	BOARD OF ETHICS	Monitor and support ongoing investigations to ensure timely completion.	Track progress throughout the year and work with staff to ensure movement.	Daily Service	11	1
TOT					11	1
3 - Conduct mandatory training on the Code of Conduct and produce ethics training materials. (1 Activity)						
	BOARD OF ETHICS	Increase Training Sessions. Increase number of trainings available to District government employees.	Allocate staff time to ensure availability when requests are made from client agencies.	Daily Service	1	1
TOT					1	1
4 - Create and maintain a highly efficient, transparent and responsive District government. (1 Activity)**						
	BOARD OF ETHICS	Ensure that every request for advice or information is acknowledged within 24 hours of receipt.	Work with staff to ensure that either a substantive response is provided or, where that is not possible, an acknowledgment that the request is under review.	Daily Service	1	0
TOT					1	0
TOT					**16**	**4**

2017 Workload Measures

All Workload Measures must be linked to a specific Operation. If Workload Measures are already in the system but not yet linked, email the Office of Performance Management with a spreadsheet that identifies to which Operation each Workload Measure belongs.

Workload Measures - Operations

Full Report | Grid Edit | Email | More 16 Measures

	Measure	New Measure/ Benchmark Year	Add Historical and Target Data (FY17)	Numerator Title	Units	Frequency of Reporting	FY 2014	FY 2015	FY 2016 Actual	FY 2017 Quarter 1
1 - Render Timely Advice. Respond to requests for informal ethics advice in a substantive and useful manner. (3 Measures)										
	Requests for informal ethics advice			Requests for informal ethics advice	Number of requests for informal ethics advice	Quarterly	511	681	690	132
	Number of formal written advisory opinions issued pursuant to a request			Number of formal written advisory opinions issued pursuant to a request	advisory opinions	Quarterly	13	5	4	6
	Number of formal written advisory opinions issued on the agency's own initiative			Number of formal written advisory opinions issued on the agency's own initiative	advisory opinions	Quarterly	5	1	2	1
2 - Monitor and support ongoing investigations to ensure timely completion. (11 Measures)										
	Complaints received			Complaints answered		Quarterly	150	137	138	14

Measure	New Measure/ Benchmark Year	Add Historical and Target Data (FY17)	Numerator Title	Units	Frequency of Reporting	FY 2014	FY 2015	FY 2016 Actual	FY 2017 Quarter 1
				Number of complaints received					
Number of preliminary investigations opened based on tips to the hotline			Number of preliminary investigations opened based on tips to hotline	investigations	Quarterly	1	1	2	0
Number of preliminary investigations dismissed			Number of preliminary investigations dismissed	investigations	Quarterly	19	12	34	4
Number of preliminary investigations opened based on information provided by means other than the hotline			Number of preliminary investigations opened based on information provided by means other than the hotline	investigations	Quarterly	32	46	85	4
Number of preliminary investigations converted to formal investigations			Number of preliminary investigations converted to formal investigations	investigations	Quarterly	2	1	3	0
Number of preliminary investigations resolved with a negotiated disposition			Number of preliminary investigations resolved with a negotiated disposition	investigations	Quarterly	6	13	12	6
Number of preliminary investigations resolved after an evidentiary hearing			Number of preliminary investigations resolved after an evidentiary hearing	investigations	Quarterly	1	0	0	0
Number of formal investigations initiated on intake			Number of formal investigations initiated on intake	investigations	Quarterly	8	12	24	2
Number of formal investigations dismissed			Number of formal investigations dismissed	investigations	Quarterly	10	7	17	2
Number of formal investigations resolved with a negotiated disposition			Number of formal investigations resolved with a negotiated disposition	investigations	Quarterly	5	2	1	3

	Measure	New Measure/ Benchmark Year	Add Historical and Target Data (FY17)	Numerator Title	Units	Frequency of Reporting	FY 2014	FY 2015	FY 2016 Actual	FY 2017 Quarter 1
	resolved after an evidentiary hearing			resolved after an evidentiary hearing						
3 - Increase Training Sessions. Increase number of trainings available to District government employees. (1 Measure)										
	Number of trainings conducted			Number of trainings conducted	trainings	Quarterly	Not available	Not available	121	28
4 - Ensure that every request for advice or information is acknowledged within 24 hours of receipt. (1 Measure)										
	Formal advisory opinions issued			Formal advisory opinions issued	Number of formal advisory opinions issued	Quarterly	13	5	8	2

2017 Strategic Initiatives

Full Report | Grid Edit | Email | More 4 Strategic initiative-operation links

	Strategic Initiative Title	Strategic Initiative Description	Proposed Completion Date	Add Initiative Update	# of Initiative Updates	Needs Initiative Update Notification
BOARD OF ETHICS (4 Strategic initiative-operation links)						
	Investigations Spreadsheet	The spreadsheet will be used to track and measure progress on each investigation. It will serve to help complete investigations within the 120 day KPI for conclusion of investigations.	09-30-2017		1	
	Meet with investigators	The meetings will be an opportunity for the investigative staff to seek guidance from senior management on case progression and for senior management to obtain information concerning obstacles to timely resolution of investigations. It will serve to help complete investigations within the 120 day KPI for conclusion of investigations.	09-30-2017		1	
	Conduct Two Hour Ethics Training Every Month	This will increase the number of ethics trainings available to employees whether or not a client agency makes a formal request. It will help achieve the KPI for increasing training opportunities by 10%.	09-30-2017		1	
	Meet with attorneys about advice requests	This will increase the quality and consistency of the ethics guidance provided to client agencies/employees.	09-30-2017		1	
TOT					**4**	

2017 Initiative Updates

Initiative Updates Full Report | Grid Edit | Email | More 4 Initiative Updates

Strategic Initiative-Operation Link - Strategic Initiative Title	Initiative Status Update	% Complete to date	Confidence in completion by end of fiscal year (9/30)?	Status of Impact	Explanation of Impact	Supporting Data	FY2017 Quarters
Conduct Two Hour Ethics Training Every Month (1 Initiative Update)							
Conduct Two Hour Ethics Training Every Month	We conduct multiple 2-hour ethics trainings every month, and employees can enroll in the program through PeopleSoft.	Complete	High	Incremental	We would like to improve attendance at the session that is held at BEGA's office each month, but nonetheless we are able to conduct training as necessary.		FY17Q1
Investigations Spreadsheet (1 Initiative Update)							
Investigations Spreadsheet	We use the spreadsheet at our weekly staff meetings to ensure that we are on target to meet the 120 day completion date.	Complete	High	Incremental	The document provides a common point of reference for all investigators and attorneys.		FY17Q1
Meet with attorneys about advice requests (1 Initiative Update)							
Meet with attorneys about advice requests	We meet with the attorneys to discuss advice requests at our weekly staff meetings and as necessary.	Complete	High	Incremental	Rendering ethics advice is at times a collaborative process and all attorneys on the staff participate.		FY17Q1
Meet with investigators (1 Initiative Update)							
Meet with investigators	We meet with investigators weekly and otherwise as needed.	Complete	High	Incremental	Meetings with investigators also occur after each witness interview.		FY17Q1

2017 Special Mayoral Plans

Strategic Initiative Header	Strategic Initiative Title	Special Mayoral Plan	Mayoral Plan Domain	Mayoral Plan Goal	Mayoral Plan Action

No links to special mayoral plans found

Administrative Information

FY Performance Plan D.C. Board of Ethics and Government Accountability FY2017 **Record ID#** 323

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EXHIBIT 12

Government of the District of Columbia
Office of the Chief Technology Officer
Applications Services Division
200 I Street SE
Washington, DC 20003

Board of Ethics and Government Accountability (BEGA)

Business Requirements Document (BRD)

For BEGA's E-filing System

For

Lobbyist Reporting
And
Financial Disclosure Statement Filing

Document Version: version 001

September 27, 2016

Revision History

Date	Version	Description	Author
09/27/2016	001	Final Document	Christopher Marshall

Signatures

Date	Printed Name/Title	Signature
9/28/16	Darrin Sobin, Director	
9/28/16	Jessica Dillion, Project Lead	
9/28/16	Christopher Marshall, IT Project Manager	

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1. INTRODUCTION

1.1 Overview

The mission of the Board of Ethics and Government Accountability (BEGA) is to investigate alleged ethics laws violations by District government employees and public officials, provides binding ethics advice and conducts mandatory training on the DC Government's Code of Conduct. The Office of Open Government is an independent office within the BEGA, and enforces the Open Meetings Act, monitors the District's Freedom of Information compliance, and aids agencies with implementing open government practices.

BEGA is responsible for receiving certain filings from Lobbyists and government employees. Lobbyists must register with BEGA once per year and pay a registration fee. Lobbyists must also file twice annually a report of lobbying activities for the preceding 6 months. There are approximately 300 lobbyists registered with BEGA.

In addition, certain high level government employees and elected officials (approximately 2500 people total) must file annually a statement of financial interests, also known as a Public Financial Disclosure Statement. This statement lists the financial interests of these employees including property ownership, asset ownership and outside employment of self and spouse.

Members of the public and the media frequently search these databases and the information therein must be easily accessible. BEGA is required to register filers and input registrant information in both filing systems, which involves a great deal of data entry. BEGA currently has existing and separate e-filing systems for Lobbyists and Financial Statement filers. These systems require enhancements, or perhaps after performed analysis, complete redesign and development in order to meet the needs of BEGA.

1.2 Project Business Objective

The objective of this effort is for a Business Analyst to gather and document detailed business/systems requirements for the BEGA E-Filing systems for Lobbyist Reporting and Financial Disclosure Statement Filings. This analysis and documentation will provide a key part of BEGA's decision to either salvage their existing systems with the addition of enhancements to the applications, or begin the process to completely redesign and develop new systems. The scope of services related to this effort entails:

- Review of BEGA's current applications.
- Conduct interviews with BEGA agency staff to gather and document existing system requirements, as well as, gather and document requirements for an enhanced or possibly new system.
- Document requirements for current system functionality.
- Document requirements for system enhancements, or complete redesign.
- Produce and deliver a Business/System Requirements Document.

1.3 Points of Contact

Agency	Name/Title	Email
OCTO	Christopher Marshall, IT Project Manager	christopher.marshall@dc.gov
BEGA	Darrin Sobin, Director	darrin.sobin@dc.gov
BEGA	Jessica Dillion, Project Lead	jessica.dillion@dc.gov

2. Project Description

2.1 Assumptions and Dependencies

BEGA subject matter experts will be available to OCTO personnel in the forms of interviews and other modes of communication for the purpose of gathering business systems requirements.

2.2 Constraints

As these are production systems and test environments are not available, some functionality may not be fully reviewed as a risk would be posed in as far as some system users might be affected.

3. User Profiles

Profile Name	Profile Type	Functions
Admin User	Internal	Is able to view and modify reports; modify email subject and body texts for specific user notifications; and create user IDs and generate user PINs.
Filer User	Internal	Will access the system via username/password/PIN to provide filing information, submit supporting documentation, and review submitted information.
Lobbyist User	Internal	Will access the system via username/password/PIN to provide filing information, submit supporting documentation, review submitted information, and make filing payments.
Public User	External	Will access the system via basic internet connection to view all Employee and Lobbyist financial disclosure filings.

4. Functional Requirements – BEGA e-Filing System (Public Facing) – Current

4.1 Financial Reports Image Search Requirements

Req ID	Requirements	Change Required? (Y/N)
4.1.1	Narrative text should provide the following information: *Images of Financial Reports submitted, beginning 2005, by Lobbyists and FDS are available below for public inspection.* *Financial reports submitted before 2005 are available for public inspection at:* *Office of Campaign Finance* *2000 14th Street, NW, Suite 433,* *Washington, DC 20009* *Call (202) 671-0547 for more information.*	**N**

4.1.2	A Filter Type Details section will be displayed with two dropdowns used for selection criteria as follows: ▪ **Filing Year** (2005 – Present) ▪ **Filer Type** - Lobbyist - Conflict of Interest (FDS)	**N**
4.1.3	A Report/Registrant Details section will be displayed. Three fields will be part of this section: ▪ Report Type ▪ Registrant Name ▪ Compensating Registrant (pre-populated when "Lobbyist" is selected for the Filer Type).	**N**
4.1.4	The Report Type field will be a dropdown field. Filter criteria will be pre-populated upon selection of "Filing Year" and "Filer Type" in the Filer Type* Detail section. *When "Lobbyist" is selected, the "Compensating Registrant" pre-populated text field is displayed. **Filter Selection – Lobbyist** ▪ July 10th Report ▪ January 10th Report ▪ Termination Report ▪ Lobbyist Registration (form 25) **Filter Selection – Conflict of Interest (FDS)** ▪ May 15th Report (pre-populated – only selection)	**N**
4.1.5	A hyperlink with the text, ***Click to find Filer Name***, will be positioned to the right of the Registrant Name field. When clicked, a pop up window will be displayed. The pop up window will display different information based on the selection of either "Lobbyist" or "Conflict of Interest (FDS). Each pop up window will be titled, ***"Active Filers List"***.	**Y**
4.1.5.1	**<u>Active Filers List – Lobbyist</u>** ▪ A search feature will be provided, which presents two text fields: ***"Committee Name"*** and ***"And/Or Comp Registrant"***. ▪ Records will be displayed on the page below the search boxes. All records presented will be in tabular format with the following fields: o No. o Registrant Name o Comp Registrant o Reg. Year ▪ Paging functionality will allow for a better experience by not displaying all records on a single page.	**Y**

4.1.5.2	**<u>Active Filers List – Conflict of Interest (FDS)</u>** ▪ A search feature will be provided, which presents two text fields: ***"Filer Name (Last Name)"*** and ***"And/Or Agency Name"***. ▪ Records will be displayed on the page below the search boxes. All records presented will be in tabular format with the following fields: o No. o Filer Name o Agency ▪ Paging functionality will allow for a better experience by not displaying all records on a single page.	**Y**

4.2 Online Training Requirements

Req ID	Requirements	Change Required? (Y/N)
4.2.1	Narrative text should provide the following information: *Welcome to the Board of Ethics and Government Accountability Online Training module. BEGA conducts periodic training sessions for users who file financial disclosure information with the agency. The online training section of this website will enable users to preview the Online Filing System over the Internet, thereby enabling them to better understand the system processes, and the steps to be taken in order to complete a successful online submission.* *Please select from the forms below to begin:*	**N**
4.2.2	Two training materials will be made available as noted below: 1. BEGA Lobbyist Filing & Reporting Training (PowerPoint slideshow) 2. PowerPoint presentation available for download. BEGA_Lobbyist_Filing_&_Reporting_Trainin	**N**
4.2.3	A section will be provided for customer feedback regarding the training as noted above. This will be in the form of a text field, which the user may use to provide their comments. After completion, a "Submit" button will allow the user to send their feedback to BEGA.	**N**

4.3 Download Data

Req ID	Requirements	Change Required? (Y/N)
4.3.1	A Data Download section will be made available, which allows the user to download data pertaining to two Filer types – **Lobbyist** and **Conflict of Interest (FDS)**. Different filter criteria will be used for each as noted below.	**N**

<table>
<tr><td>4.3.1.1</td><td><u>Data Download – Lobbyist</u>
The following filters and associated selections are provided:
o Filter Type (Lobbyist or Conflict of Interest (FDS))
o From Date (Allows date parameters)
o Payment Type (Contributions / Expenditures)
o Sort by (There are two parameters set for this filter as noted below)
<table>
<tr><th>First Selection</th><th>Second Selection</th></tr>
<tr><td>Recipient</td><td>Skip Sort Order</td></tr>
<tr><td>Amount</td><td>Recipient</td></tr>
<tr><td>Date</td><td>Amount</td></tr>
<tr><td>City</td><td>Date</td></tr>
<tr><td>State</td><td>City</td></tr>
<tr><td>Zip Code</td><td>State</td></tr>
<tr><td>Contributor</td><td>Zip Code</td></tr>
<tr><td></td><td>Contributor</td></tr>
</table>
o File Format (CSV / XML)

“Submit” and “Cancel” buttons are available to either submit or cancel the request.</td><td>Y</td></tr>
<tr><td>4.3.1.2</td><td><u>Data Download – Conflict of Interest (FDS)</u>
The following filters and associated selections are provided:
o Filter Type (Lobbyist or Conflict of Interest (FDS))
o Filing Year (Provides years from 2003 - Present)
o File Format (CSV / XML)

“Submit” and “Cancel” buttons are available to either submit or cancel the request.</td><td>N</td></tr>
</table>

4.4 Registration Disclosure Search

Req ID	Requirements	Change Required? (Y/N)
4.4.1	A page entitled **Electronic Disclosure of Registration Statements** is shown.	**Y**
4.4.2	A hyperlink titled **Lobbyists** is positioned below the page title. When the link is clicked, the user is taken to the **Lobbyist Search** page.	
4.4.3	The Lobbyist Search page has three (3) text entry fields separated by two (2) sections as follows: **Registrant** Registrant Name (text field) Year of Registration (text field) **Compensating Registrant** Compensating Registrant Name (text field)	**Y**
4.4.4	“Submit” and “Cancel” buttons will allow the user to either submit or cancel a Lobbyist Search request.	**N**

4.5 FDS Registrant Activity Search

Req ID	Requirements	Change Required? (Y/N)

4.5.1	A page entitled **FDS Registrant Activity Search** is shown.	**N**
4.5.2	The following four (4) text entry fields are shown to the user: ▪ First Name ▪ Last Name* ▪ Reporting Year ▪ Position *The Last Name field will be a required field.	**Y**
4.5.3	"Submit" and "Cancel" buttons will allow the user to either submit or cancel a Lobbyist Search request.	**N**
4.5.4	Submitting a search will return all records within the parameters set. Records will be displayed in tabular format with the following fields: ▪ Last Name, First Name ▪ Reporting Year ▪ Position ▪ Agency Name	**N**
4.5.5	Records will be sorted by: ▪ First Name ▪ Last Name ▪ Position	**Y**
4.5.6	Records may be sorted in Ascending or Descending order.	**N**
4.5.7	Paging functionality will allow for a better experience by not displaying all records on a single page.	**N**
4.5.8	All Registrant names will be hyperlinked to their individual Financial Disclosure form.	**N**
4.5.9	A "Previous" button will provide the user with functionality to return to their search results.	**N**
4.5.10	A "Back to Search Menu" link will allow the user to return to the FDS Registrant Activity page.	**N**

4.6 Lobbyist Activity Search

Req ID	Requirements	Change Required? (Y/N)
4.6.1	A page entitled **Lobbyist Activity Search** is shown.	**Y**
4.6.2	A hyperlink titled **Lobbying Information** is positioned below the page title. When the link is clicked, the user is taken to the **Lobbying Information Search** page.	**Y**
4.6.3	Two (2) expandable sections are provided: "Lobbyist Communication" and "Lobbyist Activity".	**Y**

4.6.4	When the **Lobbyist Communication** section is expanded, the following fields are displayed: ▪ Registration Year* ▪ Official Name ▪ Title ▪ Date (provides date range parameters – From/Through) *The Registration Year field will be a required field.	**Y**
4.6.4.1	Two (2) buttons will be positioned below the text entry fields: ▪ **Previous** (initiates command to take user back to previous page). ▪ **Submit Search** (initiates command to submit the search based on the completed fields).	**Y**
4.6.4.2	When the "Submit Search" command is executed, the user is taken to the **Lobbyist Communication Search Results** page. The results are displayed in tabular format with the following column headings: ▪ Lobbyist Name ▪ Compensating Registrant Name ▪ Official Name ▪ Date	**Y**
4.6.4.3	Two (2) buttons will be positioned below the search results: ▪ **Previous** (initiates command to take user back to previous page). ▪ **Lobbying Information Search** (initiates command to return the user to the Lobbying Information Search page to initiate a new search for Lobbyist Communication or Lobbyist Activity).	**Y**
4.6.4.4	Paging functionality will allow for a better experience by not displaying all records on a single page.	**Y**
4.6.5	When the **Lobbyist Activity** section is expanded, the following fields are displayed: ▪ Registration Year* ▪ Subject Name ▪ Description *The Registration Year field will be a required field.	**Y**
4.6.5.1	Two (2) buttons will be positioned below the text entry fields: ▪ **Previous** (initiates command to take user back to previous page). ▪ **Submit Search** (initiates command to submit the search based on the completed fields).	**Y**

4.6.5.2	When the "Submit Search" command is executed, the user is taken to the **Lobbyist Activity Search Results** page. The results are displayed in tabular format with the following column headings: ▪ Lobbyist Name ▪ Compensating Registrant Name ▪ Subject ▪ Description	**Y**
4.6.5.3	Two (2) buttons will be positioned below the search results: ▪ **Previous** (initiates command to take user back to previous page). ▪ **Lobbying Information Search** (initiates command to return the user to the Lobbying Information Search page to initiate a new search for Lobbyist Communication or Lobbyist Activity).	**Y**
4.6.5.4	Paging functionality will allow for a better experience by not displaying all records on a single page.	**Y**

4.7 Reports and Summaries

Req ID	Requirements	Change Required ? (Y/N)
4.7.1	Narrative text should provide the following information: ***BEGA Reports & Summaries*** *The Board of Ethics and Government Accountability provides statistical reports and summary information of Contribution and Expenditure activity based upon the financial records of candidates and political committees who are registered with the office. The summary reports depict contributions received by contributor type and amount, and expenditures made by transaction type. The statistical reports illustrate the percentages of contributions received by contributor type and amount, and the expenditures by transaction type. You may also view summary information concerning the financial disclosures of public officials and lobbyists.*	**Y**
4.7.2	Two hyperlinks are presented to the user beneath the narrative text: ▪ DC Register Publication of Financial Disclosure Statement Filers ▪ Lobbyist Reports	**Y**

4.7.3	**DC Register Publication of Financial Disclosure Statement Filers** The user is presented with the following link at the top of the page: Introduction to FDS Upon clicking the link, the user is taken to a page titled: ***DC Register of Financial Disclosure Statement Filers***. The following narrative text is displayed immediately under the title: *List of persons who have filed or requested an extension to file Financial Disclosure Statements and persons who have failed to file Financial Disclosure Statements. The Director of Campaign Finance herewith publishes a list of the names of candidates, officers, and employees who have filed Financial Disclosure Statements, or requested an extension to file such statements with the District of Columbia Office of Campaign Finance, pursuant to the District of Columbia Campaign Finance Reform and Conflict of Interest Act of 1974, as amended, DC Official Code § 1-1106.02(d)(1) (2001 Edition). DC Official Code § 1-1106.02(d)(1) provides that the Director of Campaign Finance (Board of Elections and Ethics) shall publish, in the DC Register, each year, the name of each candidate, officer, and employee who has filed a Financial Disclosure Statement pursuant to DC Official Code § 1-1106.02; the name of each candidate, officer, and employee who has sought and received an extension for the filing deadline requirement and the reason therefore; and the name of each candidate, officer, and employee who has not filed a Financial Disclosure Statement and the reason for not filing, if known. This listing complies with DC Official Code § 1-1106.02(d)(1).* The following five (5) hyperlinks are presented to the user immediately following the narrative text: 1. Filing Requirements 2. Non-Filers 3. Where to File 4. Corrections 5. Penalties for Violation of Financial Disclosure Filing Requirements	**Y**
4.7.3.1	Each link takes the user to different sections within the same hyperlinked page. Each link takes the user to the specific titled area within that page. The following information is displayed to the user: ***Filing Requirements*** *On or before May 15 of every year, each person listed was required to file a Financial Disclosure Statement with the Director of Board of Ethics and Government Accountability. In addition, each person listed is required to submit a Financial Disclosure Statement amendment to the Director of Board of Ethics and Government Accountability within thirty (30) days of any change in information in a previously filed statement, and to file such statement with the Director of Board of Ethics and Government Accountability within ninety (90) days of vacating a position, if the filer ceases to serve prior to May 15th of any year, or on their last day of office. The name of each candidate, officer, and employee required to file Financial Disclosure Statements was published in the April 26, 2002 DC Register [see Vol.49, No. 17].* *Please be advised that each candidate, officer, and employee, who has filed a Financial Disclosure Statement with the Director of Board of Ethics and Government Accountability since January 1, 2002, is not required to file another statement pursuant to this Notice, unless there is any change in the information supplied in the previously filed statement.* ***Non-Filers***	**N**

	Each candidate, officer, and employee whose name appeared in the lists published in the DC Register on April 26, 2003, and who has failed to file the statutory Financial Disclosure Statement with the Director of Board of Ethics and Government Accountability, may be in violation of DC Official Code § 1-1106.02. *Please contact the Office of Board of Ethics and Government Accountability to obtain a Financial Disclosure Statement or additional information regarding the filing of the Statement on (202) 671-0547, or visit the Office at 2000 14th Street, NW, Suite 433, Washington, DC 20009. Our business hours are 9:00 am until 4:30 pm. Copies of the District of Columbia Board of Ethics and Government Accountability Reform and Conflict of Interest Act of 1974, as amended, at DC Official Code § 1-1106.02, may be obtained at the Board of Ethics and Government Accountability.* ***Where to File*** *Financial Disclosure Statements and documents must be mailed or delivered to:* *Cliff Tatum* *Director* *Board of Ethics and Government Accountability* *441 4th Street NW, 830 South* *Washington, DC 20001* ***Corrections*** *Any corrections to the information published herein, should be directed to the Board of Ethics and Government Accountability. Further, any candidate, officer, or employee who has filed the Financial Disclosure Statement under DC Official Code § 1-1106.02(a) or (b), but is not listed as having filed, should contact the Director of Board of Ethics and Government Accountability.* ***Penalties for Violation of Financial Disclosure Filing Requirements*** *A civil penalty under DC Official Code § 1-1103.05(b) may be imposed ministerially by the Director of Board of Ethics and Government Accountability, upon any person required to file a Financial Disclosure Statement who commits any of the following violations:* *a. Failure to file a Financial Disclosure Statement;* *b. Failure to timely file a Financial Disclosure Statement;* *c. Failure to file a complete Financial Disclosure Statement; and* *d. Failure to file additional information, pertaining to the Financial Disclosure Statement, as requested by the Director.* *A person who knowingly files a false or misleading Financial Disclosure Statement is subject to the penalties under DC Official Code § 1-1107.01(b).*	
4.7.3.2	After each section a back button will be displayed, which sends the user back to the previous page.	**N**

4.7.4	**Lobbyist Reports** The user is presented with a series of PDF files, which present Lobbyist Reports by year and for the months of January and July. The reports are under the purview of the DC Office of Campaign Finance. The following provides a link to the July 2012 report, as well as, a sample record: July 2012	**N**

DC OFFICE OF CAMPAIGN FINANCE

Summary of Registered Lobbyists: July, 2012

Lobbyist ID	*Lobbyist Name*	*Compensating Registrant*	*Registrant Date*
Registrant Name		*Address*	*July Date*
Permanent Address		*City, State and Zip*	
City, State and Zip		*Nature of Lobbying*	
LOB000122447	Ellen Valentino-Benitez	7-Eleven	1/10/2012
7-Eleven		One Arts Plaza 1722 Routh Street	7/10/2012
One Arts Plaza 1722 Routh Street		Dallas, TX 75202	
Dallas, TX 75202		Retail products	

5. Functional Requirements – Internal Systems – Financial Disclosure Filing System – Current

5.1 Users, Authentication, and Permissions

Req ID	Requirements	Change Required? (Y/N)
5.1.1	The FDS Filer User will log in to the system using their BEGA issued user ID and password.	**Y**

5.2 FDS e-Filing – User Role

Req ID	Requirements	Change Required? (Y/N)
5.2.1	Once the user logs in, they are taken to the Financial Disclosure Filing System main screen. The sections of the main screen will be under the heading, “Preliminary Selection”. Two (2) sections are provided to the user:	**N**

	• Public Financial Disclosure Statement (link to the filing) • User Preferences	
5.2.2	**Public Financial Disclosure Statement** The user is presented with the following narrative text: *Each public official subject to section 224(a) of the District of Columbia Board of Ethics and Government Accountability Establishment and Comprehensive Ethics Reform Act of 2011 (D.C. Official Code § 1-1162.24 (2015 Supp.)), is required to complete and submit this Public Financial Disclosure Statement to the Board of Ethics and Government Accountability (BEGA) annually, not later than May 15th of each year for the prior calendar year. A public official must also complete and submit a Public Financial Disclosure Statement within 90 days after the end of their appointment to office, if the filer ceases to serve prior to May 15th of any year.* ***All questions on this form should be answered for the prior calendar year. If the form is submitted as an Amendment, answer only the question to which there is a change in information.*** When the user clicks the Public Financial Disclosure link, they are taken to the next screen, which has a reporting year field. This field will be a dropdown pre-populated with the most recent reporting year required. After the user selects the reporting year and presses continue, they are taken to the **Filer Menu – FDS Form**. Three (3) sections are provided on this screen: • File A New Report (the functionality provided will allow the user to start/continue their FDS Report for the selected reporting year). • File an Amendment (the functionality provided will allow the user to start/continue their Amendment for the selected reporting year). • View Filer Profile (the functionality provided will allow the user to view their registration details). **File a New Report** When the user clicks on the File a New Report link, they are taken to Step 1 of report form (See Appendix E). When Step 1 of the form is completed, the user is taken to Step 2 of the form (See Appendix E) where all of their financial disclosure information is entered. The following help text is provided” ***Instructions*** • *There are twelve (12) Yes or no questions. You must answer each question.* • *To enter a response to a question click on the link that says “click to provide this information” under each question. It will prompt you to answer **"YES"** or **"NO"**.* • *The form is complete when there is a **"YES"** or **"NO"** answer under the **“Question Answered”** box for each question.* • *If you need to attach supplemental documents you can do so at the bottom of*	**Y**

	the form.
	• *If you cannot agree to all of the statements in the Certification, please explain why in the text box titled **"Additional Information"**.*
	• *After carefully reading the Certification and entering your name and PIN number, click **"Certify and Submit"** to SUBMIT the form*
	  o *Submission of this report means you have completed the report and that the report is ready for filing with BEGA.*
	  o *Once a report is submitted, it can only be changed by filing an amendment.*
	
	Twelve (12) questions will be provided to the user as part of their financial disclosure. Each question will have an accompanying link to a web form, which will allow the user to provide the requested information (See Appendix E). Each form will also allow the user to add another entry as indicated in Appendix E.
	
	Following all questions, there will also be a section where the user may attach any supplemental documentation.
	
	After answering all questions, the user will be able to continue to the certification screen. The Certification Screen (Appendix E) will allow the user to submit the filing.
	
	View Filer Profile
	
	All filer registration details will be displayed (See Appendix E).	

5.2.3	**User Preferences** The user will be provided with a link to view or modify their login information. Two (2) options will be provided: • Option One: User ID Modification (will provide the user with the means to change their User ID). • Option Two: Password Modification (will provide the user with the means to change their password).	**Y**

5.3 FDS e-Filing – Administrator Role

Req ID	Requirements	Change Required? (Y/N)
5.3.1	The administrator (admin) page may be accessed here: https://efiling.bega-dc.gov/admin/login.asp	**N**
5.3.2	Two (2) text entry fields for **User ID** and **Password** are provided.	**Y**
5.3.4	The logged in user is displayed.	**N**

5.3.5	Three sections with hyperlinks are displayed as noted below: **Type of Filers** Lobbyists Financial Disclosure Statement (FDS) **Admin Tasks** Manage User Profile Manage Election Dates **Imaging System** Scan Filed Reports Financial Reports Images Search	**Y**
Req ID	**Requirements**	**Change Required? (Y/N)**
5.3.5.1	Type of Filers - Lobbyists When the Lobbyist link is selected the user is taken to the Lobbyist Menu. The Lobbyist menu provides the user with three (3) sections with hyperlinks under each as shown below: **Registration** Lobbyist Registration Lobbyist Re Registration Lobbyist Search **Reports** Internal System Reports Publish Website Reports **Letters and Mailing Labels** Lobbyist Letters Lobbyist Non Compliance Letters Lobbyist Registration Fee Non Compliance Letters Mailing Labels Mailing Labels (Non-Compliance) Registration Fee Mailing Labels (Non-Compliance)	**N**

5.3.5.1.2	**Registration** Lobbyist Registration When Lobbyist Registration is clicked, the user is taken to the Lobbyist Registration Form. The first screen represents the first step of a four step registration process. The following form fields are displayed: **Step 1** ▪ Filing Fee Enclosed (Title text field) - Profit / $250.00 (Checkbox field) - Non-Profit / $50.00 (Checkbox field) ▪ Registration Year (Text field) Required ▪ Name of Registrant (Section text field) - Full Name (Text field) Required - Date of Registration (Date Field) Required ▪ Permanent Address (Section Text Field) - Number and Street (Text Field) Required - City (Text Field), State (Dropdown pre-populated with all states) and Zip Code (Text Field) Required ▪ Temporary Address (while lobbying) (Section text field) - Number and Street (Text Field) City (Text Field), State (Dropdown pre-populated with all states) and Zip Code (Text Field) ▪ Daytime Phone# (Three (3) number text fields) Required ▪ Home Phone# (Three (3) number text fields) ▪ Email Address (Text field) "Continue" and "Reset' buttons are at the bottom of the form. "Continue" will execute a command to proceed to the next screen. "Reset" will execute a command to clear all fields on the form. The following narrative text will be displayed at the bottom of the form and highlighted in red. *Note: OCF Identification Number in the Paper form will be generated by the System in the end of the Registration Process.* *Amendment in the Paper form is automatically determined by the System.* *Fields marked with * are required.* **Step 2 of 4: Lobbyists Working for Registrant** After clicking the "Continue" button, the user is taken to the second screen where the following narrative text is displayed: *List the full name of each in-house person employed and each individual retained by you to lobby on your behalf. If you do not employ an in-house person or retain an individual to lobby, state non-applicable.* The following form fields will be displayed: ▪ Full Name (Text Field) Required ▪ Mailing Address (Section Text Field) ▪ Address (Text Field) Required ▪ City (Text Field), State (Dropdown pre-populated with all states) and	**N**

Zip Code (Text Field) Required
- Daytime Phone# (Three (3) number text fields)

"Add New Entry", "Continue", and "Reset" buttons are at the bottom of the form. "Add New Entry" will execute a command to add additional information. "Continue" will execute a command to proceed to the next screen. "Reset" will execute a command to clear all fields on the form.

The following narrative text will be displayed at the bottom of the form and highlighted in red.

Note: For more than one entries Click "Add New Entry"
*Fields marked with * are required.*

*Fields marked with ** are Non-Editable/Pre-Populated*

Step 3 of 4: Person Compensating Registrant

After clicking the "Continue" button, the user is taken to the third screen where the following narrative text is displayed:

List the full name of each client with whom you have a contract to provide lobbying services.

The following form fields will be displayed:

- Full Name (Text Field) Required
- Mailing Address (Section Text field)
- Address (Text Field) Required

- City (Text Field), State (Dropdown pre-populated with all states) and Zip Code (Text Field) Required
- Daytime Phone# (Three (3) number text fields) Required
- Nature of Business (Text Field)
- Terms of Compensation (Section Text Field)
- Salary (Text Field)
- Duration of Employment (Text Field)

"Continue" and "Reset' buttons are at the bottom of the form. "Continue" will execute a command to proceed to the next screen. "Reset" will execute a command to clear all fields on the form.

The following narrative text will be displayed at the bottom of the form and highlighted in red.

*Note: Fields marked with * are required.*

Step 4 of 4: Lobbyist Activity Matters

After clicking the "Continue" button, the user is taken to the fourth screen where the following narrative text is displayed:

Identify matters(s) by subject and formal designation on which the lobbyist/registrant expects to lobby

The following form fields will be displayed:

- Subject Name (Text Field) Required
- Description (Multi-line Text Field)

"Add New Entry", "Continue", and "Reset" buttons are at the bottom of the form. "Add New Entry" will execute a command to add additional information. "Continue" will execute a command to proceed to the next screen. "Reset" will execute a command to clear all fields on the form.

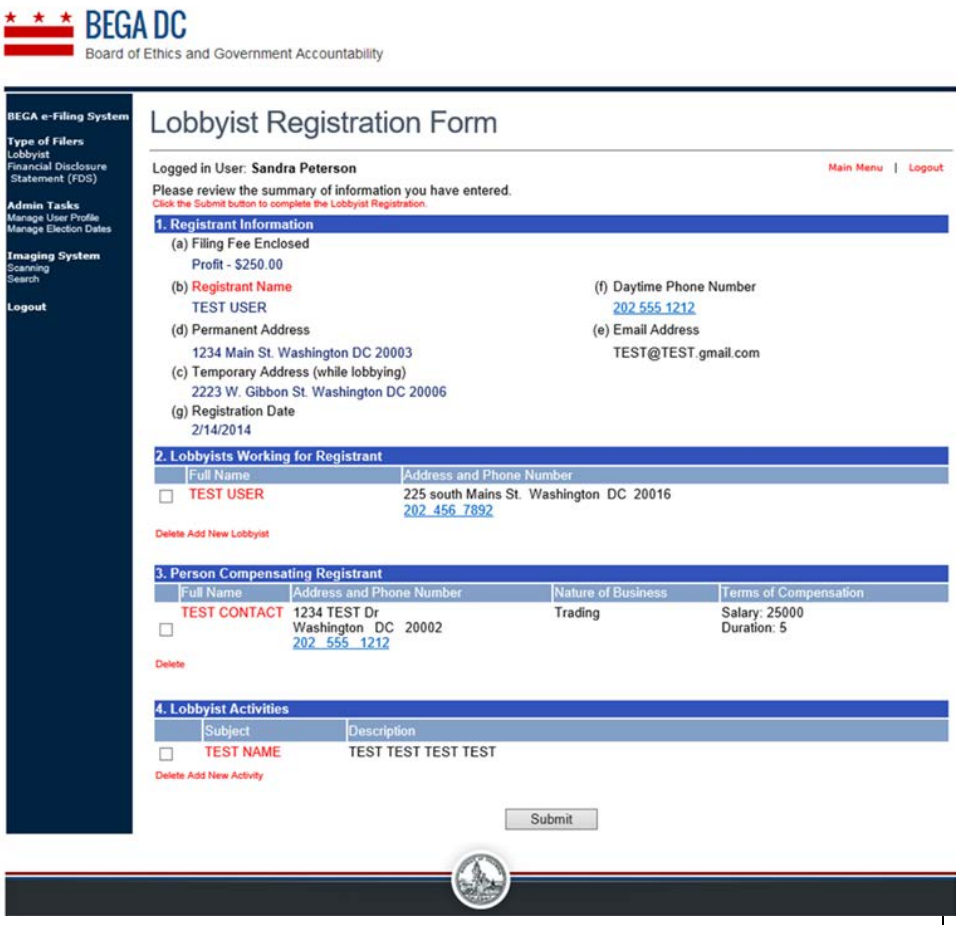
The following narrative text will be displayed at the bottom of the form and highlighted in red.

Note: For more than one entries Click "Add New Entry"
*Fields marked with * are required.*

After clicking the "Continue" button, the user is taken to the final screen where the following narrative text is displayed:

Please review the summary of information you have entered.
Click the Submit button to complete the Lobbyist Registration.

The completed form is then displayed to the user as seen below in the following screen capture:



- Each section on the form will allow the user to link back to their registrant information to make any necessary edits.

- **Section 2: Lobbyists Working for Registrant** will allow the user to "Delete" or "Add New Lobbyist" to the section.
- **Section 3: Person Compensating Registrant** will allow the user to "Delete" the person compensating the registrant.
- **Section 4: Lobbyist Activities** will allow the user to "Delete" or "Add New Activity" to the section.
- A "Submit" button will be displayed at the bottom of the form. Clicking the "Submit" button will execute the command to submit the form.

After clicking "Submit" the user is advised that the form has been submitted successfully. The following narrative text is displayed:

Statement of Information for Lobbyist has been completed successfully.
Click the CONTINUE button to access Form 26 or the NEW ENTRY button to commence a new Statement of Information.

The following fields are displayed beneath the text:

- Lobbyist Identification Details (Section Title)
- BEGA/OCF Identification Number
- Amendment

- Name
- Compensating Registrant Name
- Entry Date
- Entered By
- Login Details (Section Title)
- Login ID
- Password
- PIN

The previous fields are followed by five (5) buttons which execute the following commands:

- **Continue Filing** (The user will be taken to the page, "Filer Menu – Form 26). The following links and accompanying text are displayed:

  - **File a New Report**
    This selection will display a new report, not previously submitted reports or the reports that you have begun filing but have not submitted.

    Upon clicking the link, the user is taken the next page and provided with the following informational text:

    Information Necessary to File a New Report

    The lobbyist needs to provide the full name and address of the reporting lobbyist, lobbyists working for registrant, the report type, the employers name and address, amount of each contribution received as compensation, gifts and honoraria, and the full name and mailing address (if any) of each entity to whom expenditures were made including the amount and purpose of the expenditure.

Before commencing the filing procedure, you are advised to obtain, from the date of registration, detailed records of all contributions and expenditures disclosed in reports and statements filed with the Director, including check stubs, bank statements, canceled checks, contributor cards, deposit slips, invoices, receipts, contracts, payroll records, all tax records, lease agreements, journals, ledgers, and vouchers.

This option will only allow the filer to file a completely new report. To resume filing of a report that is current, or for which the filing process has begun, please select the Resume Current Reports option. To amend an already submitted report, please select the Amendment option.

Step Overview:

1.Select Filing Year
2.Select Reporting Period
3.Verify Filing Period
4.Enter Schedule Data
5.View Summary Page
6.Submit Completed Report

After final submission of the form, you can print out reports generated by the system for paper-based submission to the BEGA.

Two buttons are provided, “Previous” and “Continue”. The “Previous” button takes the user to the previous page. The “Continue” button takes the user to the incorrect login page.

- **File an Amendment**
  This selection will display current reports that have been submitted.

  Upon clicking the link, the user is taken the next page and provided with the following informational text:

  Information Necessary to File an Amendment

  To file an amendment, the lobbyist should know the report type that should be amended and the information that is to be added or deleted. (full name and address of the reporting lobbyist, lobbyists working for registrant, the report type, the employers name and address, amount of each contribution received as compensation, gifts and honoraria, and the full name and mailing address (if any) of each entity to whom expenditures were made including the amount and purpose of the expenditure).

  Before commencing the filing procedure, you are advised to obtain, from the date of registration, detailed records of all contributions and expenditures disclosed in reports and statements filed with the Director, including check stubs, bank statements, canceled checks, contributor cards, deposit slips, invoices, receipts, contracts, payroll records, all tax records, lease agreements, petty cash journals, ledgers, and vouchers.

  This option will only allow you to amend a submitted report. To edit a report that is current, or which has not been submitted, please select the Resume Current Reports option. Please note only reports that have been filed online can be amended online. Please contact the

BEGA for paper-based forms to amend a report that was filed using a paper form.

Step Overview:

1.Select Filing Year
2.Select Reporting Period
3.Verify Filing Period
4.Enter Schedule Data
5.View Summary Page

6.Submit Completed Report

After final submission of the form, you can print out reports generated by the system for paper-based submission to the BEGA.

Two buttons are provided, “Previous” and “Continue” (“Continue” button appears to not be working), to take the user back to the previous page or to continue to the next page.

- **Resume Current Reports**
  This selection will display reports that you have begun filing, but have not submitted. This selection will re-insert you back to the page from where you last exited.

  Upon clicking the link, the user is taken the next page and provided with the following informational text:

Information Necessary to File a Current Report

To resume a current report (recent filing), the filer should know the report which he/she is continuing to file and the information that is to be added or deleted. (the full name and address of the reporting lobbyist, lobbyists working for registrant, the report type, the employers name and address,

amount of each contribution received as compensation, gifts and honoraria, and the full name and mailing address (if any) of each entity to whom expenditures were made including the amount and purpose of the expenditure).

Before commencing the filing procedure, you are advised to obtain, from the date of registration, detailed records of all contributions and expenditures disclosed in reports and statements filed with the Director, including check stubs, bank statements, canceled checks, contributor cards, deposit slips, invoices, receipts, contracts, payroll records, all tax records, lease agreements, petty cash journals, ledgers, and vouchers.

You can only resume filing of a report that is current, or for which the filing process has begun. To file a new report, please select the File New Report option.

Step Overview:

1.Select Report
2.Verify Filing Period
3.Enter Schedule Data
4.View Summary Page
5.Submit Completed Report

	After final submission of the form, you can print out reports generated by the system for paper-based submission to the BEGA. Two buttons are provided, “Previous” and “Continue” (“Continue” button appears to not be working), to take the user back to the previous page or to continue to the next page. o **View Previously Filed Reports** Please note that this selection will display current reports that have been submitted. If no reports have been submitted, the user receives a message stating: “No Previously Filed Reports Found”. o **View or Modify Filer Profile** The information includes Registrant, Compensation Registrant details. (Information is currently not being displayed. The command times out). ▪ **New Registration** Allows the user to submit a new registration. **(See Req ID 5.3.5.2)** ▪ **Re Registration** The following fields are displayed: o Filer Type Details (Text field header) Required Field o Registration Year (Dropdown field with ability to select year) Required Field o Lobbyist Name (Text Field) Required Field o **Click to find Lobbyist Name – This link must be clicked to display Lobbyist Names which appear via a pop up box. However, this function is currently not operating properly, so the user cannot advance to the next screen.** o Compensating Lobbyist Name (Text Field) Required Field o Date of Registration (Date Field) Two buttons will be displayed below the form fields – “Save” and “Cancel” ▪ **Edit Details** Allows the user to return to the Lobbyist Registration Form and make any necessary changes. ▪ **Generate PIN** (User will be advised that a PIN already exists. A “Regenerate” button executes a command to generate a new PIN in the event that the user has lost the original PIN).	
5.3.5.1.3	**Registration** Lobbyist Re Registration **(Refer to Req ID 5.3.5.2)**; specifically, the following as this requirement is	**N**

	exactly the same, and with the same issues. The following fields are displayed: o Filer Type Details (Text field header) Required Field o Registration Year (Dropdown field with ability to select year) Required Field o Lobbyist Name (Text Field) Required Field o **Click to find Lobbyist Name – This link must be clicked to display Lobbyist Names which appear via a pop up box. However, this function is currently not operating properly, so the user cannot advance to the next screen.** o Compensating Lobbyist Name (Text Field) Required Field o Date of Registration (Date Field) Two buttons will be displayed below the form fields – "Save" and "Cancel"	
5.3.5.1.4	**Registration** Lobbyist Search After clicking on this link, the user is taken the next screen where the following form fields are displayed: o Logged in User: Displays logged in user. o Year of Registration: Text field to input registration year. o Registrant Name: Text field for registrant name. o Lobbyist ID: Last 4 digits of OCF ID in part or full). Two buttons will be provided: "Submit" and "Previous". o When the user clicks the "Submit" button, the search command using the provided information is executed. o When the user clicks the "Previous" button the function which takes the user to the Lobbyist Menu. Two hyperlinks are provided: "Main Menu" and "Logout" o When the user clicks the "Main Menu" link they are taken back to the BEAGA Main Menu page. o When the user clicks the "Logout" link, they are logged out of the system.	**N**

5.3.5.1.5	**Reports** Internal System Reports When the user clicks on “Internal Systems Reports” they are taken to the following page: **BEGA Lobbyist Internal Reports**. The user is presented with the following: o Logged in User (Displays logged in user) o Report Selection – Lobbyist (Title Header) o Lobbyist Reports – (Title) The following reports are listed under Lobbyist Reports.	**N**

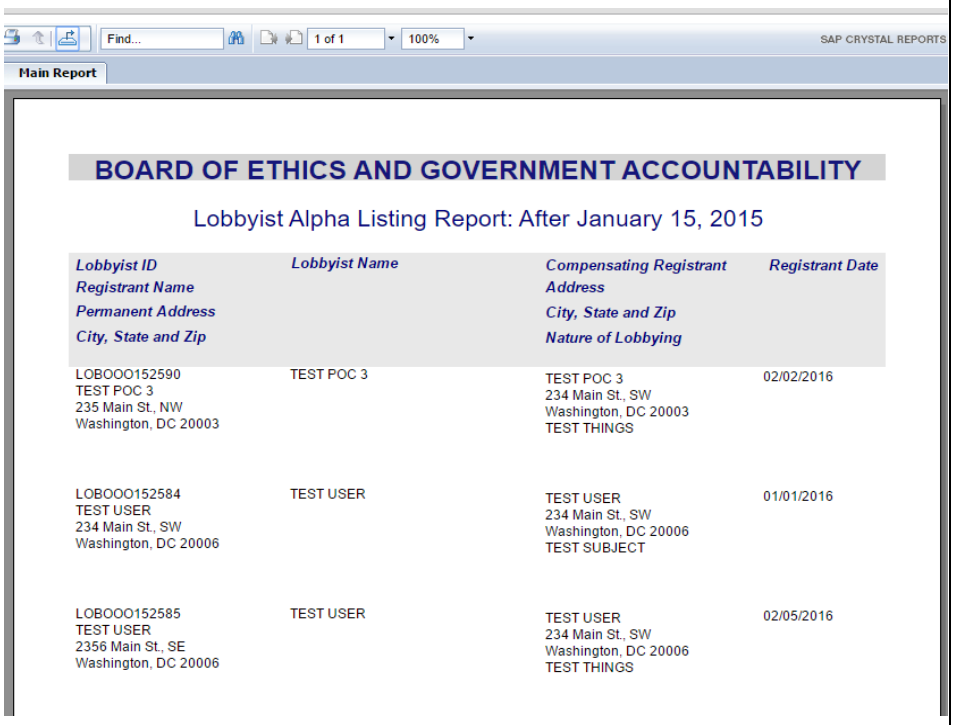
5.3.5.1.6

- **Lobbyist Alpha Listing (Lobbyist Registration Report)**

  The following fields are displayed when the Lobbyist Alpha Listing (Lobbyist Registration Report) is selected:

  - Registration Year (Dropdown field where user may select year). Required Field
  - Registration Type (Dropdown field with the following selections: "On or before January 15th", "After January 15th", "All Registrations". Required Field
  - Sort by (Dropdown field with the following selections; "Registrant Name", Registration Date".

  Two buttons are displayed: "View Reports" and "Cancel".
  The "View Reports" button, when clicked, will execute a command function to view reports based on the selected criteria. An example is shown below:



  The "Cancel" button, when clicked, will execute a command function to take the user back to the BEGA Lobbyist Internal Reports Selection Menu.

  Two hyperlinks are provided: "Main Menu" and "Logout"

  - When the user clicks the "Main Menu" link they are taken back to the BEAGA Main Menu page.
  - When the user clicks the "Logout" link, they are logged out of the system.

N

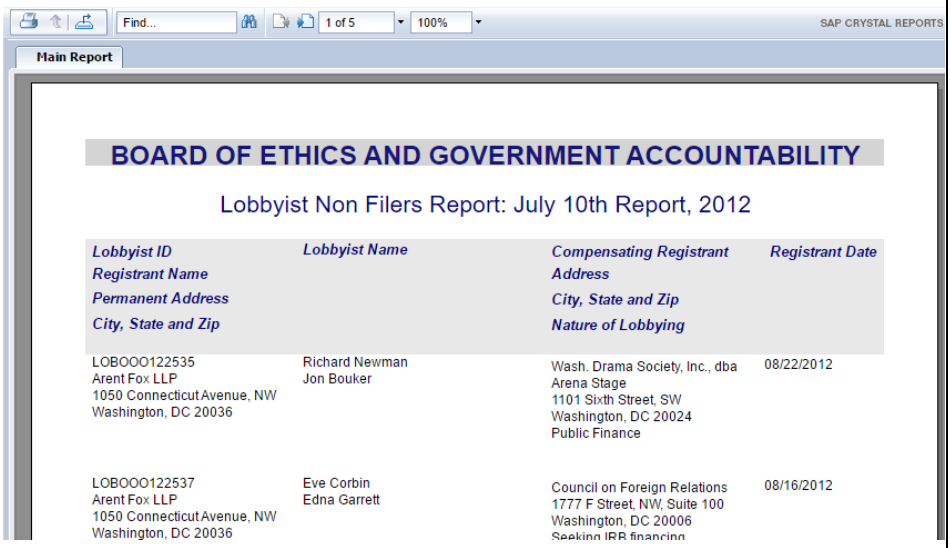
5.3.5.1.7	• **Filers Report** The following fields are displayed when the Filers Report is selected: • Filing Year (Dropdown field where user may select year). Required Field • Reporting Period (Dropdown field with the following selections: "July 10th Report", "January 10th Report)". Required Field • Sort by (Dropdown field with the following selections; "Registrant Name", Registration Date". Two buttons are displayed: "View Reports" and "Cancel". The "View Reports" button, when clicked, will execute a command function to view reports based on the selected criteria. An example is shown below: The "Cancel" button, when clicked, will execute a command function to take the user back to the BEGA Lobbyist Internal Reports Selection Menu. Two hyperlinks are provided: "Main Menu" and "Logout" o When the user clicks the "Main Menu" link they are taken back to the BEAGA Main Menu page. o When the user clicks the "Logout" link, they are logged out of the system.	**N**

- **Non-Filers Report**

  The following fields are displayed when the Non-Filers Report is selected:

  - Filing Year (Dropdown field where user may select year). Required Field
  - Reporting Period (Dropdown field with the following selections: "July 10th Report", "January 10th Report)". Required Field
  - Sort by (Dropdown field with the following selections; "Registrant Name", Registration Date".

  Two buttons are displayed: "View Reports" and "Cancel". The "View Reports" button, when clicked, will execute a command function to view reports based on the selected criteria. An example is shown below:

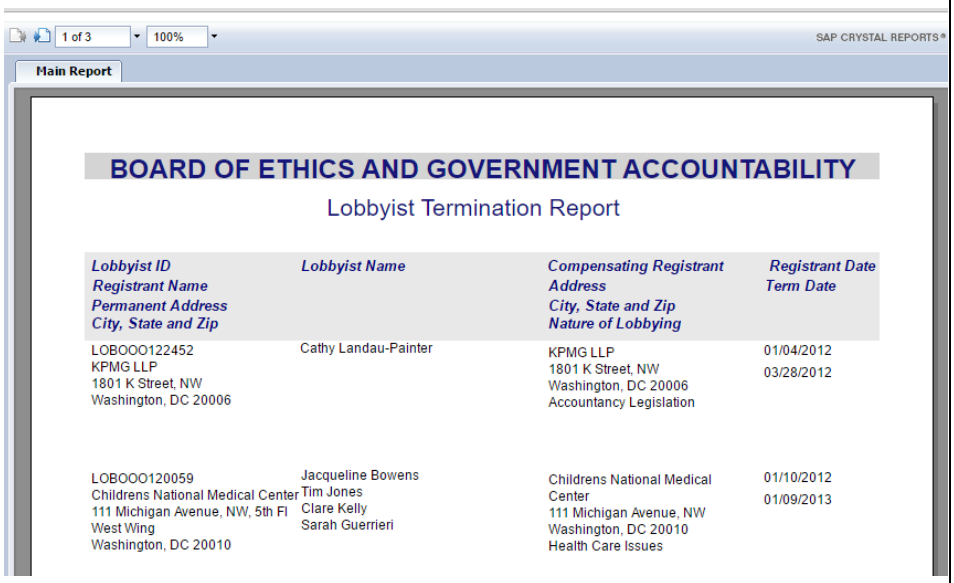


  The "Cancel" button, when clicked, will execute a command function to take the user back to the BEGA Lobbyist Internal Reports Selection Menu.

  Two hyperlinks are provided: "Main Menu" and "Logout"

  - When the user clicks the "Main Menu" link they are taken back to the BEGA Main Menu page.
  - When the user clicks the "Logout" link, they are logged out of the system.

5.3.5.1.8 | **N**

5.3.5.1.9	• **Termination Report** The following fields are displayed when the Termination Report is selected: • Filing Year (Dropdown field where user may select year). Required Field • Sort by (Dropdown field with the following selections; "Registrant Name", Registration Date". Two buttons are displayed: "View Reports" and "Cancel". The "View Reports" button, when clicked, will execute a command function to view reports based on the selected criteria. An example is shown below:  The "Cancel" button, when clicked, will execute a command function to take the user back to the BEGA Lobbyist Internal Reports Selection Menu. Two hyperlinks are provided: "Main Menu" and "Logout" o When the user clicks the "Main Menu" link they are taken back to the BEAGA Main Menu page. o When the user clicks the "Logout" link, they are logged out of the system.	**N**

5.3.5.1.10	**Reports** Publish Website Reports When the user clicks on “Publish Website Reports” they are taken to the following page: **BEGA Website Reports**. The user is presented with the following: o Logged in User (Displays logged in user) o Lobbyist Website Report (Title Header) o Selection Criteria (Title Header) o Filing Year (Dropdown field where user may select year). o Reporting Period (Dropdown field with the following selections: “July 10th Report”, “January 10th Report”, Registration Report”). Two buttons are displayed: “Generate Reports” and “Delete Reports” *. The “Generate Reports” button, when clicked, will execute a command function to view reports based on the selected criteria. The user is first taken to a page titled, **BEGA Web Reports**. The page displays the following: o Logged in User (Displays logged in user) o The following text: “Registration Report is Generated Successfully” o The text, “Registration Report” is a hyperlink to the generated report. o The following text: Please review the report before publishing: o Reviewed** (Checkbox field) o Two buttons will be displayed – “Publish Reports” * and “Previous”. **The “Reviewed” checkbox and “Publish Reports” buttons are grayed out and non-functioning until after the report has been viewed. When the user clicks the “Registration Report” link, a report is generated in PDF format and displayed to user as seen in the figure below: **DC OFFICE OF CAMPAIGN FINANCE** Registration Report for the Year 2012 ***Lobbyist ID*** / ***Lobbyist Name*** / ***Compensating Registrant*** / ***Registrant Date*** ***Registrant Name*** / ***Address*** ***Permanent Address*** / ***City, State and Zip*** ***City, State and Zip*** / ***Nature of Lobbying*** LOBOOO121428 SEIU Local 32BJ attn. Leslie Jack 25 West 18th Street, 5th Floor New York, NY 10011 / Martin Thomas Kevin Hils / SEIU Local 32BJ 101 Ave of the Americans New York, NY 10013 Leg. concerning building service workers & security officers / 12/19/2011 LOBOOO121989 Roy L. Kaufmann 1120 20th Street, NW, S-300 Washington, DC 20036 / Roy L. Kaufmann / D.C. Land Title Association 1120 20th St., NW. #300 Washington, DC 20036 Taxes on Real Estate / 12/21/2011	**N**

	o After the report is viewed, the "Reviewed" checkbox is now available to the user if they choose to click. o After the report is viewed, the "Publish Reports" button is now available to the user. o When the "Publish Reports" button is clicked, a command is executed, which publishes the report. o When the user clicks the "Previous" button, they are taken back to the previous page. *If the "Delete Reports" button is clicked it will delete the report that is generated using the user selected criteria.	
5.3.5.1.11	**Letters and Mailing Labels** Lobbyist Letters When the user clicks on "Lobbyist Letters" they are taken to the following page: **BEGA Lobbyist Internal Reports**. The user is presented with the following: o Logged in User (Displays logged in user) o Lobbyist Letter (title header) o Filing Year (Dropdown field where user may select year). **Required field** o Reporting Period (Dropdown field where the user may select the following reports: "July 10th Report", January 10th Report). **Required field** o Sort by (dropdown field where the user may select "Registrant Name" or Registration Date"). o Date (mm/dd/yyyy) (Date entry field) o "View Reports" button o When the user clicks the button a command is executed, which displays the Lobbyist Letter **(see Appendix B, Fig. 1)** based on the user selected criteria. o "Cancel" button o When the user clicks the button a command is executed, which clears the user selections. Two hyperlinks are provided: "Main Menu" and "Logout" o When the user clicks the "Main Menu" link they are taken back to the BEGA Main Menu page. o When the user clicks the "Logout" link, they are logged out of the system.	**N**
5.3.5.1.12	**Letters and Mailing Labels** Lobbyist Non Compliance Letters When the user clicks on "Lobbyist Non Compliance Letters" they are taken to the following page: **BEGA Lobbyist Internal Reports**. The user is presented with the following:	**N**

	o Logged in User (Displays logged in user) o Lobbyist Non-Compliance Letter (title header) o Filing Year (Dropdown field where user may select year). **Required field** o Reporting Period (Dropdown field where the user may select the following reports: "July 10th Report", January 10th Report). **Required field** o Sort by (dropdown field where the user may select "Registrant Name" or Registration Date"). o Date (mm/dd/yyyy) (Date entry field) o "View Reports" button o When the user clicks the button a command is executed, which displays the Lobbyist Letter **(see Appendix B, Fig. 2)** based on the user selected criteria. o "Cancel" button o When the user clicks the button a command is executed, which clears the user selections. Two hyperlinks are provided: "Main Menu" and "Logout" o When the user clicks the "Main Menu" link they are taken back to the BEGA Main Menu page. o When the user clicks the "Logout" link, they are logged out of the system.	
5.3.5.1.13	**Letters and Mailing Labels** Lobbyist Registration Fee Non Compliance Letters When the user clicks on "Lobbyist Registration Fee Non Compliance Letters" they are taken to the following page: **BEGA Lobbyist Internal Reports**. The user is presented with the following: o Logged in User (Displays logged in user) o Registration Year (Dropdown field where user may select year). **Required field** o Sort by (dropdown field where the user may select "Registrant Name" or Registration Date"). o "View Reports" button o When the user clicks the button a command is executed, which displays the Lobbyist Letter **(see Appendix B, Fig. 3)** based on the user selected criteria. o "Cancel" button o When the user clicks the button a command is executed, which clears the user selections. Two hyperlinks are provided: "Main Menu" and "Logout" o When the user clicks the "Main Menu" link they are taken back to the BEGA Main Menu page.	**N**

	o When the user clicks the “Logout” link, they are logged out of the system.	
5.3.5.1.14	**Letters and Mailing Labels** Mailing Labels When the user clicks on “Mailing Labels” they are taken to the following page: **BEGA Lobbyist Internal Reports**. The user is presented with the following: o Logged in User (Displays logged in user) o Lobbyist Labels (title header) o Filing Year (Dropdown field where user may select year). **Required field** o Reporting Period (Dropdown field where the user may select the following reports: “July 10th Report”, January 10th Report). **Required field** o Sort by (dropdown field where the user may select “Registrant Name” or Registration Date”). o “View Reports” button o When the user clicks the button a command is executed, which displays the Lobbyist Letter **(see Appendix B, Fig. 4)** based on the user selected criteria. o “Cancel” button o When the user clicks the button a command is executed, which clears the user selections. Two hyperlinks are provided: “Main Menu” and “Logout” o When the user clicks the “Main Menu” link they are taken back to the BEGA Main Menu page. o When the user clicks the “Logout” link, they are logged out of the system.	**N**
5.3.5.1.15	**Letters and Mailing Labels** Mailing Labels (Non-Compliance) When the user clicks on “Mailing Labels (Non-Compliance)” they are taken to the following page: **BEGA Lobbyist Internal Reports**. The user is presented with the following: o Logged in User (Displays logged in user) o Lobbyist Non-Compliance Labels (title header) o Filing Year (Dropdown field where user may select year). **Required field** o Reporting Period (Dropdown field where the user may select the following reports: “July 10th Report”, January 10th Report). **Required field** o Sort by (dropdown field where the user may select “Registrant Name” or Registration Date”). o “View Reports” button	**N**

	o When the user clicks the button a command is executed, which displays the Lobbyist Letter **(see Appendix B, Fig. 5)** based on the user selected criteria. o "Cancel" button o When the user clicks the button a command is executed, which clears the user selections. Two hyperlinks are provided: "Main Menu" and "Logout" o When the user clicks the "Main Menu" link they are taken back to the BEGA Main Menu page. o When the user clicks the "Logout" link, they are logged out of the system.	
5.3.5.1.16	**Letters and Mailing Labels** Registration Fee Mailing Labels (Non-Compliance) When the user clicks on "Registration Fee Mailing Labels (Non-Compliance)" they are taken to the following page: **BEGA Lobbyist Internal Reports**. The user is presented with the following: o Logged in User (Displays logged in user) o Lobbyist Labels (title header) o Registration Year (Dropdown field where user may select year). **Required field** o Sort by (dropdown field where the user may select "Registrant Name" or Registration Date"). o "View Reports" button o When the user clicks the button a command is executed, which displays the Lobbyist Letter **(see Appendix B, Fig. 6)** based on the user selected criteria. o "Cancel" button o When the user clicks the button a command is executed, which clears the user selections. Two hyperlinks are provided: "Main Menu" and "Logout" o When the user clicks the "Main Menu" link they are taken back to the BEGA Main Menu page. o When the user clicks the "Logout" link, they are logged out of the system.	**N**
5.3.5.2	Type of Filers – Financial Disclosure Statement (FDS) When the Financial Disclosure Statement (FDS) link is selected the user is taken to the Financial Disclosure Statement Menu. The FDS menu provides the user with four (4) sections with hyperlinks under each as shown below:	**Y**

	Registration FDS Registration FDS Re-Registration for Non-Terminated Filers FDS Registrant Search FDS Non-Filers/Late-Filers Fine Payments **Reports** Internal System Reports Publish Website Reports **Letters and Mailing Labels** FDS Letters FDS ANC Letters FDS Candidate Letters FDS Honorary Letters FDS Non Compliance Letters FDS ANC Non Compliance Letters FDS Candidate Non Compliance Letters Mailing Labels Mailing Labels (Non-Compliance) Mailing Labels (ANC Non-Compliance) Mailing Labels (Candidate Non-Compliance) **Admin Tasks** Agency Details Modify FDS Letters Modify FDS ANC Letters Modify FDS Candidate Letters Modify FDS Honorary Letters Modify FDS Non Compliance Letters Modify FDS ANC Non Compliance Letters Modify FDS Candidate Non Compliance Letters Manage FDS Email Notifications	
5.3.5.2.1	**Registration** FDS Registration When the user clicks “FDS Registration” they are taken to the FDS Registration page and presented with the following fields: o ANC – This will be a checkbox o Registration Year (yyyy) – This will be a date field where the year is entered. **Required Field** o Reporting Year (yyyy) – This will be a date field where the year is entered. **Required Field** o Name of Registrant – This will be a bolded title header. o Prefix – This will be a dropdown field with the following selections: “Mr., Ms., Dr.” o First Name – This will be a text field. **Required Field** o MI – This will be a text field. o Last Name – This will be a text field. **Required Field**	**N**

- **Suffix** – This will be a text field.
- **BEGA Registration Date** – This will be a date field. **Required Field**
- **Position for which filing** – this will be a text field.
- **Home Address** – This will be a bolded title header.
- **Number and Street** – this will be a text field. **Required Field**
- **City, State and Zip** **Required Fields**
  - **City** – This will be a text field with default text, "Washington".
  - **State** – This will be a dropdown field with all 50 states, The District of Columbia, The U.S. Virgin Islands, and Puerto Rico provided as selections. "DC (Dist. Of Columbia) will field's default value.
  - **Zip** – This will be a text field.
- **Business Address** – This will be a bolded title header.
- **Number and Street** – This will be a text field.
- **City, State and Zip**
  - **City** – This will be a text field with default text, "Washington".
  - **State** – This will be a dropdown field with all 50 states, The District of Columbia, The U.S. Virgin Islands, and Puerto Rico provided as selections. "DC (Dist. Of Columbia) will field's default value.
  - **Zip** – This will be a text field.
- **Business Phone#** - This will be a three (3) part text field with each part used for three (3) digits of a nine (9) digit telephone number.
- **Home Phone#** - This will be a three (3) part text field with each part used for three (3) digits of a nine (9) digit telephone number.
- **Email Address** - This will be a text field.
- **Grade** – This will be a text field. The user will enter their designated salary grade if applicable.
- **Main Agency** – This will be a dropdown field populated with every District agency along with its associated budget code. **Required Field**
- **Sub Agency 1** - This will be a dropdown field populated with every District agency along with its associated budget code.
- **Sub Agency 2** - This will be a dropdown field populated with every District agency along with its associated budget code.
- **Sub Agency 3** - This will be a dropdown field populated with every District agency along with its associated budget code.
- **District Email Address** – This will be a text field.
- **Agency Head** – this will be a checkbox.

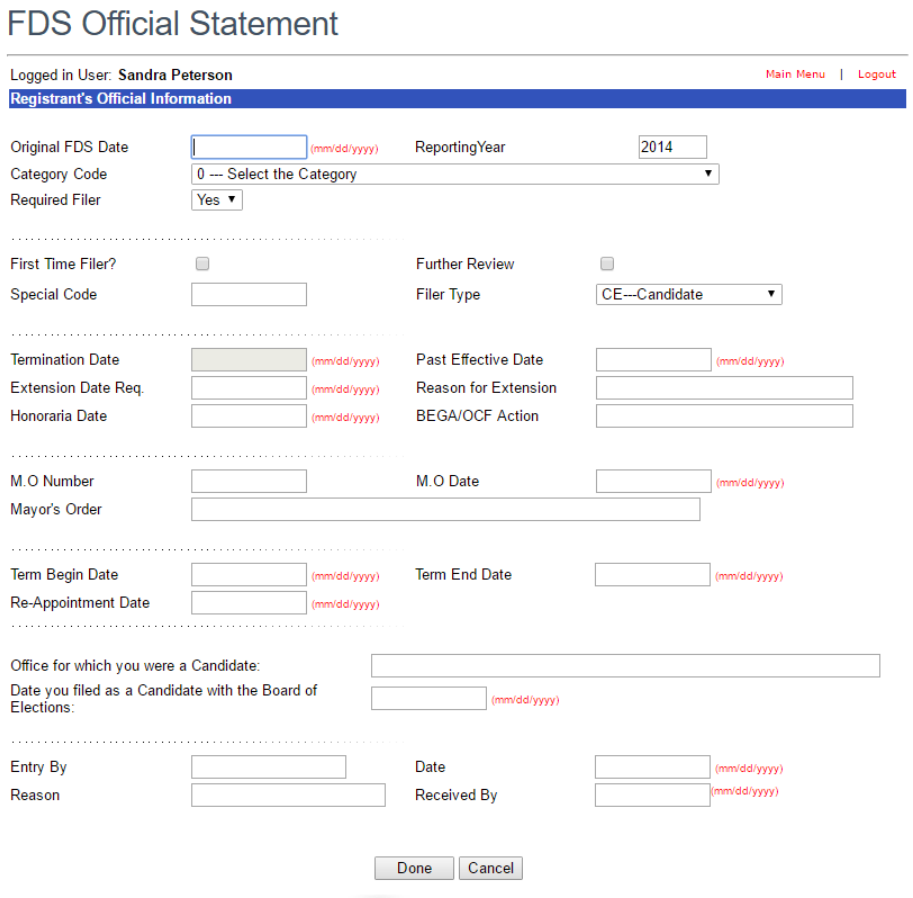
When the ANC checkbox field is checked, the following commands are executed:

- **The following fields are removed:**
  - Grade
  - Main Agency
  - Sub Agency 1
  - Sub Agency 2
  - Sub Agency 3
  - District Email Address
  - Agency Head

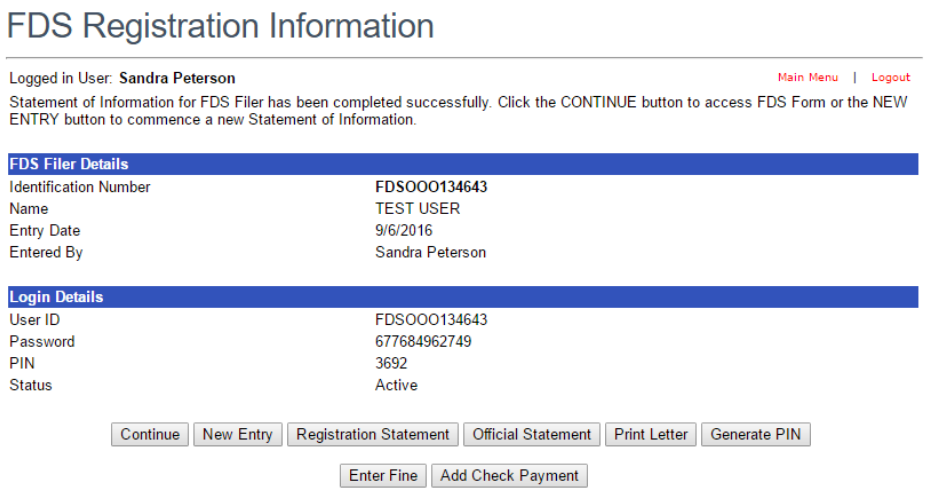
- **The removed fields are replaced by the following fields:**
  - ANC/SMD – This will be a bolded title header.
  - ANC – This will be a dropdown listing all ANCs. **Required Field**
  - Single Member District (SMD) – This will be a text field.
  - Three (3) buttons will be positioned below the form:

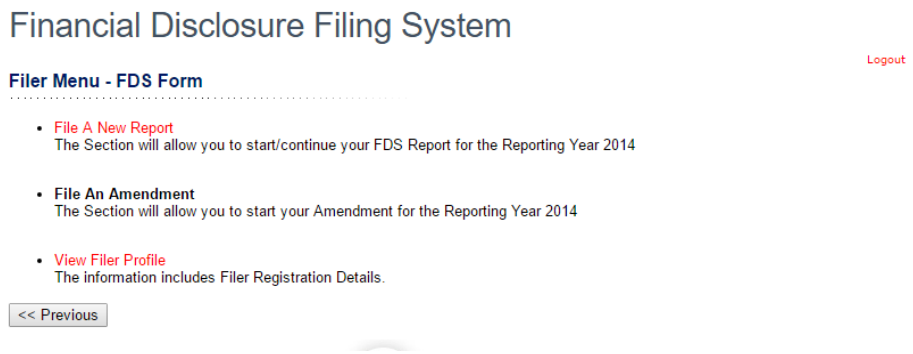
- o "Continue"
- o "Done"
- o "Cancel"

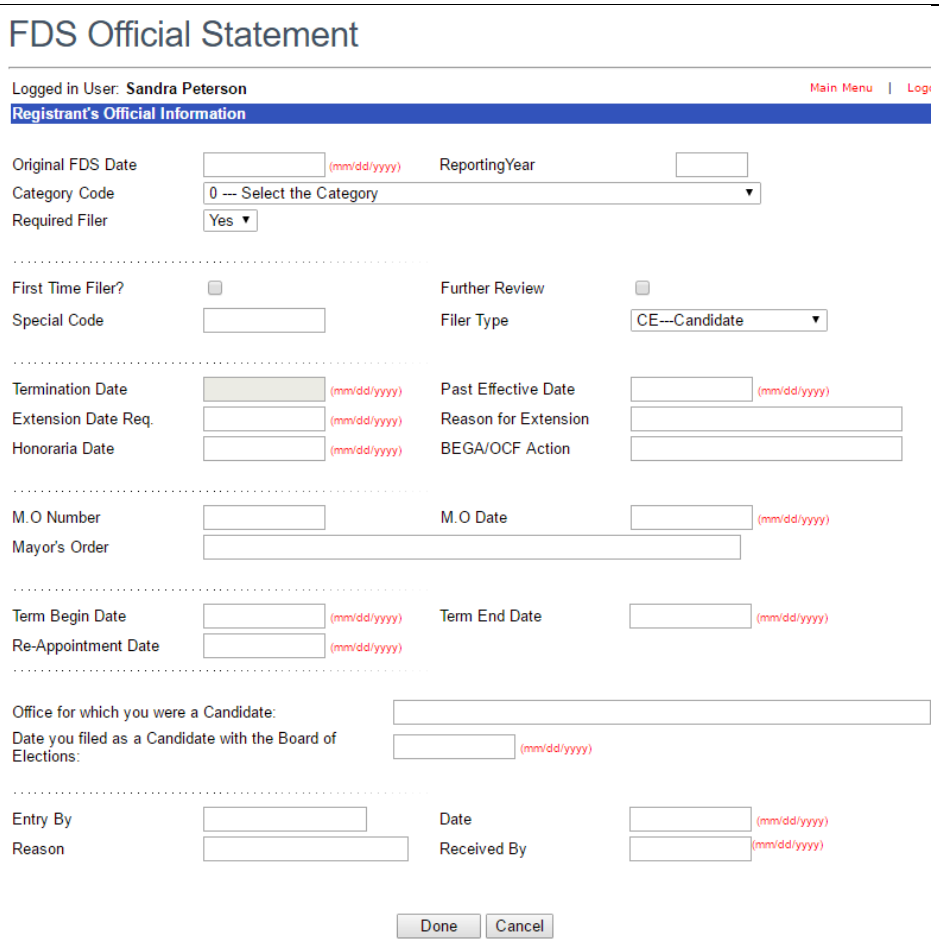
When the user chooses "Continue" they are presented with the following screen:



When the user selects "Done" they are presented with the following screen:

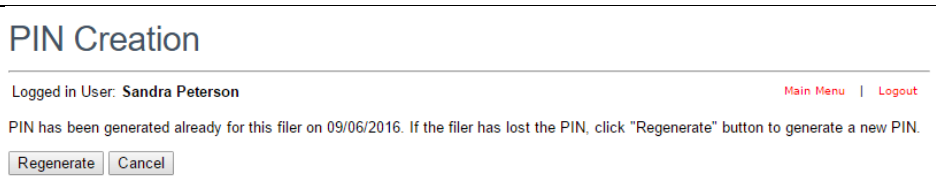


	They user is presented with the following buttons: o Continue o New Entry o Registration Statement o Official Statement o Print Letter o Generate PIN o Enter Fine o Add Check payment When the user chooses “Continue” they are presented with the following screen:  When the user chooses “New Entry” they are returned to FDS Registration screen. When the user chooses “Registration Statement” they are returned to FDS Registration screen. When the user chooses “Official Statement” they are presented with the following screen:	**N**



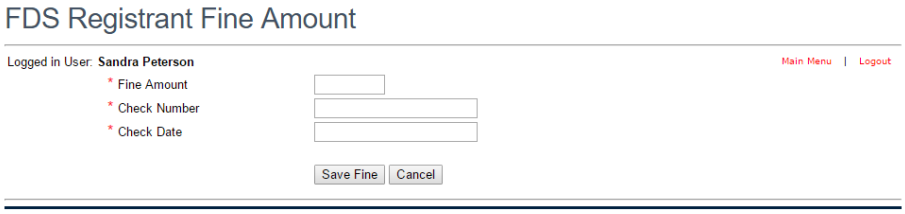
When the user chooses “Print Letter” they are presented with the following screen:

When the user chooses “Generate PIN” they are presented with the following screen:

<table>
<tr>
<td></td>
<td>


When the user chooses “Enter Fine” they are presented with the following screen: **This command is generating a technical error.**

When the user chooses “Add Check Payment” they are presented with the following screen:



When the user chooses “Cancel” they are returned to the Financial Disclosure Statement Menu.

Two hyperlinks are provided: “Main Menu” and “Logout”

- When the user clicks the “Main Menu” link they are taken back to the BEGA Main Menu page.
- When the user clicks the “Logout” link, they are logged out of the system.

The following text will be displayed at the bottom of the FDS Registration page:

Note: BEGA Identification Number in the Paper form will be generated by the System in the end of the Registration Process.

Amendment in the Paper form is automatically determined by the System.

Fields marked with * are required.
</td>
<td></td>
</tr>
<tr>
<td>5.3.5.2.2</td>
<td>
Registration
FDS Re-Registration for Non-Terminated Filers

When the user clicks “FDS Re-Registration for Non-Terminated Filers” they are taken to the FDS Re-Registration for Non-Terminated Filers page and presented with the following fields:

- Logged in User: (This will be the user currently logged in).
</td>
<td>**N**</td>
</tr>
</table>

	o Please Click the "FDS Renewal" button to renew the ids of all non-terminated FDS Filer to current year. (This will be a narrative text field). o Agency/ANC (This will be a dropdown list comprised of ANCs, Boards, District Agencies, and Private entities). Two buttons will be displayed at the bottom of the fields: o 'List FDS Filers" (when pressed, this button will execute a command to list all FDS filers based on the selected Agency/ANC). o After this command is executed, two (2) checkbox fields and two (2) buttons will be displayed: • Select All (checkbox that will ensure that all available resultant names are selected). • Checkbox (checkbox that will select individual resultant names). • Renew (button, which when pressed will execute a command to renew the selected resultant names). • Cancel (button, which when pressed will execute a command to clear the current results). o "Previous" (when pressed, this button will execute a command to return the user to the Financial Disclosure Statement Menu). Two hyperlinks are provided: "Main Menu" and "Logout" o When the user clicks the "Main Menu" link they are taken back to the BEGA Main Menu page. o When the user clicks the "Logout" link, they are logged out of the system.	
5.3.5.2.3	**Registration** FDS Registrant Search When the user clicks, "FDS Registrant Search, they are taken to the FDS Registrant Search page and presented with the following fields: o Logged in User: (This will be the user currently logged in). o Year of Registration (text field for registration year) o Registrant First Name (text field for first name of registrant) o Registrant Last Name (text field for last name of registrant) o Position for which filing (text field for searched for position) o Agency/ANC (This will be a dropdown list comprised of ANCs, Boards, District Agencies, and Private entities). o BEGA ID (text field of BEGA issued ID) Two buttons will be displayed at the bottom of the fields: o Submit (when pressed this will execute a command showing the registrant(s) based on the selected criteria. The following screen is shown;	**N**

FDS Search Result

Logged in User: **Sandra Peterson**

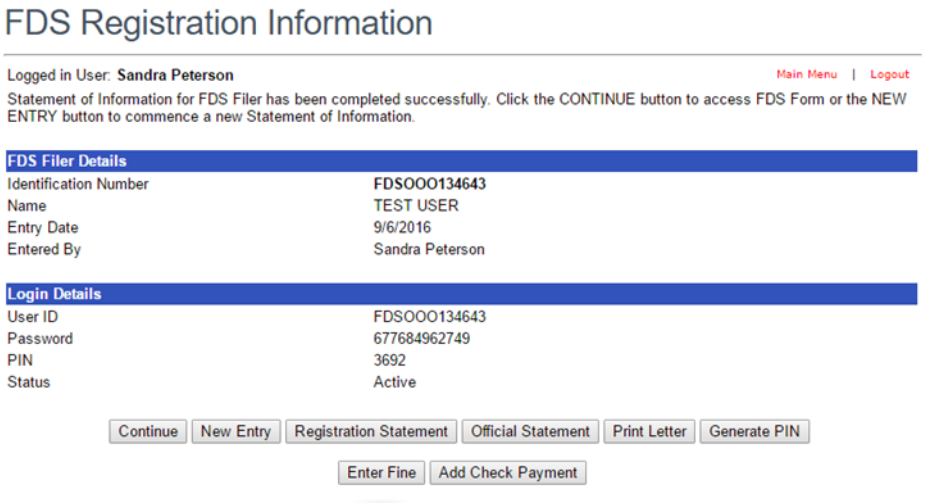
Main Menu | L

Page 1 of 40 Total Record

Sort By: Registrant ID | Registrant Name **Order:** Ascending | Descending **Back To:** Search Menu | FDS

	Registrant ID	Registrant Name	Position	Agency Name	Status	Filed by	Filing Da
☐	FDSOOO139918	Abbott, Vera	Board Member	Office of Employee Appeals	Active	BEGA	05/02/201
☐	FDSOOO130335	Abdul-Rahim, Winifred	Scheduler/Legislative Asst.	Council of the District of Columbia	Active	BEGA	05/03/201
☐	FDSOOO139884	Abraham, Jauhar	Candidate (Ward 8 Council Member)	Council of the District of Columbia	Active		Not Filed
☐	FDSOOO139768	Acosta, Marcel	Board of Zoning Adjustment	Office of Zoning	Active	Filer	04/24/201
☐	FDSOOO130408	ADDERLEY, BARBARA	REGIONAL SUPERINTENDENT	District of Columbia Public Schools	Active		Not Filed

As noted in the above graphic, the Registrant ID will be presented as a hyperlink. When the user clicks the link they are taken to the following screen:



FDS Registration Information

Logged in User: **Sandra Peterson** Main Menu | Logout

Statement of Information for FDS Filer has been completed successfully. Click the CONTINUE button to access FDS Form or the NEW ENTRY button to commence a new Statement of Information.

FDS Filer Details

Identification Number	**FDSOOO134643**
Name	TEST USER
Entry Date	9/6/2016
Entered By	Sandra Peterson

Login Details

User ID	FDSOOO134643
Password	677684962749
PIN	3692
Status	Active

Continue | New Entry | Registration Statement | Official Statement | Print Letter | Generate PIN

Enter Fine | Add Check Payment

They user is presented with the following buttons:

- Continue
- New Entry
- Registration Statement
- Official Statement
- Print Letter
- Generate PIN
- Enter Fine
- Add Check payment

When the user chooses “Continue” they are presented with the following screen:

Clicking on the above links will allow the user to submit and/or retrieve FDS filings. Please refer to **Appendix C** for screenshots related to this functionality:

- Cancel (when pressed this will execute a command returning the user to the Financial Disclosure Statement Menu)

When the user clicks on “New Entry” they are taken to the FDS Registration page. (**Please refer to Req. 5.3.5.2.1**)

When the user clicks on “Registration Statement” they are taken to the FDS Registration page. (**Please refer to Req. 5.3.5.2.1**)

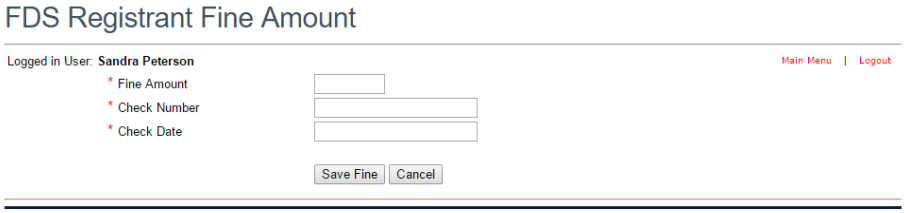
When the user clicks on “Official Statement” they are FDS Official Statement page. (**Please refer to Req. 5.3.5.2.1**)

When the user clicks on “Print Letter” they are taken to the BEGA FDS Letters screen. (**Please refer to Req. 5.3.5.2.1**)

When the user clicks on “Generate PIN” they are taken to the PIN Creation screen. (**Please refer to Req. 5.3.5.2.1**)

When the user chooses “Enter Fine” they are presented with the following screen: **This command is generating a technical error.**

When the user chooses “Add Check Payment” they are presented with the following screen:



Two hyperlinks are provided: “Main Menu” and “Logout”

- When the user clicks the “Main Menu” link they are taken back to the BEGA Main Menu page.

	o When the user clicks the “Logout” link, they are logged out of the system.	
5.3.5.2.4	**Registration** FDS Non-Filers/Late-Filers Fine Payments When the user clicks “FDS Non-Filers/Late-Filers Fine Payments” they are taken to the FDS Non-Filers/Late-Filers Fine Payments page and presented with the following fields: o Logged in User: (This will be the user currently logged in). o Year of Registration (text field for registration year) o Registrant First Name (text field for first name of registrant) o Registrant Last Name (text field for last name of registrant) o Position for which filing (text field for searched for position) o Agency/ANC (This will be a dropdown list comprised of ANCs, Boards, District Agencies, and Private entities). o BEGA ID (text field of BEGA issued ID) o Filer Type (This will be a dropdown list with the following selections: “Non-Filers”, “Late-Filers”, Non-Filers & Late-Filers”) o Show Pending Payments Only (This will be a checkbox) Two buttons will be displayed at the bottom of the fields: o Submit (When pressed, this will execute the command to submit the selected search criteria). o Cancel (When pressed, this will execute the command that returns the user to the Financial Disclosure Statement Menu)	**N**
5.3.5.2.5	**Reports** Internal System Reports When the user clicks the Internal Systems Reports link, they are taken to the BEGA Internal Reports Selection menu page where the following report links are available: o **FDS Alpha Listing** o **Filers Report** o **Non Filers Report** o **Non Filers Report by Agency** o **Further Review Required Report** o **Required Filer Report** o **Extension Requested Filer Report** When the **FDS Alpha Listing** link is clicked the user is taken to the BEGA Internal Reports page where the following fields are displayed: o Logged in User (this will display the logged in user) o Internal Reports (this will be a title field) o Selection Criteria (this will be a title field) o Reporting year (this will be a dropdown field where a given year may be selected). o Agency (this will be a dropdown list of ANCs and agencies).	**N**

	There will be a "View Reports" button displayed at the bottom of the fields. (When the user presses this button it executes a command for the report to be displayed) **(See Appendix C)** When the user clicks the **Filers Report** link they are taken to the BEGA Internal Reports page where the following fields are displayed: o Logged in User (this will display the logged in user). o Filers Report (this will be a title field). o Selection Criteria (this will be a title field). o Reporting Year (this will be a dropdown field where a given year may be selected). **Required Field** There will be a "View Reports" button displayed at the bottom of the fields. (When the user presses this button it executes a command for the report to be displayed) **(See Appendix C)** When the user clicks the **Non-Filers Report** link they are taken to the BEGA Internal Reports page where the following fields are displayed: o Logged in User (this will display the logged in user). o Non-Filers Report (this will be a title field). o Selection Criteria (this will be a title field). o Reporting Year (this will be a dropdown field where a given year may be selected). **Required Field** There will be a "View Reports" button displayed at the bottom of the fields. (When the user presses this button it executes a command for the report to be displayed) **(See Appendix C)** When the user clicks the **Non-Filers Report by Agency** link they are taken to the BEGA Internal Reports page where the following fields are displayed: o Logged in User (this will display the logged in user). o Internal Reports (this will be a title field). o Selection Criteria (this will be a title field). o Reporting Year (this will be a dropdown field where a given year may be selected). **Required Field** o Agency (this will be a dropdown field of agencies, ANCs, and boards). There will be a "View Reports" button displayed at the bottom of the fields. (When the user presses this button it executes a command for the report to be displayed) **(See Appendix C)** When the user clicks the **Further Review Required Report** link they are taken to the BEGA Internal Reports page where the following fields are displayed: o Logged in User (this will display the logged in user). o Internal Reports (this will be a title field). o Selection Criteria (this will be a title field). o Reporting Year (this will be a dropdown field where a given year may be selected). **Required Field** There will be a "View Reports" button displayed at the bottom of the fields. (When the user presses this button it executes a command for the report to be displayed) **(See Appendix C)**	

	When the user clicks **Required Filer Report** link they are taken to the BEGA Internal Reports page where the following fields are displayed: o Logged in User (this will display the logged in user). o Internal Reports (this will be a title field). o Selection Criteria (this will be a title field). o Reporting Year (this will be a dropdown field where a given year may be selected). **Required Field** There will be a "View Reports" button displayed at the bottom of the fields. (When the user presses this button it executes a command for the report to be displayed) **(See Appendix C)** When the user clicks the **Extension Requested Filer Report** link they are taken to the BEGA Internal Reports page where the following fields are displayed: o Logged in User (this will display the logged in user). o Internal Reports (this will be a title field). o Selection Criteria (this will be a title field). o Reporting Year (this will be a dropdown field where a given year may be selected). **Required Field** There will be a "View Reports" button displayed at the bottom of the fields. (When the user presses this button it executes a command for the report to be displayed) **(See Appendix C)**	
5.3.5.2.6	**Reports** Publish Website Reports When the user clicks the **Required Filers Report** link they are taken to the BEGA Website Reports Publishing page where the following fields are displayed: o Logged in User (this will display the logged in user). o FDS Required Filers Report (this will be a title field). o Selection Criteria (this will be a title field). o Reporting Year (this will be a dropdown field where a given year may be selected). **Required Field** There will be a "Generate Reports" button displayed at the bottom of the fields, as well as, a "Delete Reports" button. (When the user presses the "Generate Reports" button it executes a command for the report to be displayed. A PDF link is then made available to the user to view the report). **(See Appendix C)** When the user clicks the **Filers Report** link they are taken to the BEGA Website Reports Publishing page where the following fields are displayed: o Logged in User (this will display the logged in user). o FDS Filers Report (this will be a title field). o Selection Criteria (this will be a title field). o Reporting Year (this will be a dropdown field where a given year may be selected). **Required Field**	**N**

	There will be a “Generate Reports” button displayed at the bottom of the fields, as well as, a “Delete Reports” button. (When the user presses the “Generate Reports” button it executes a command for the report to be displayed. A PDF link is then made available to the user to view the report). **(See Appendix C)** When the user clicks the **Who Failed to File Report** link they are taken to the BEGA Website Reports Publishing page where the following fields are displayed: o Logged in User (this will display the logged in user). o FDS Who Failed to File Report (this will be a title field). o Selection Criteria (this will be a title field). o Reporting Year (this will be a dropdown field where a given year may be selected). **Required Field** There will be a “Generate Reports” button displayed at the bottom of the fields, as well as, a “Delete Reports” button. (When the user presses the “Generate Reports” button it executes a command for the report to be displayed. A PDF link is then made available to the user to view the report). **(See Appendix C)** When the user clicks the **Who Filed Extension Report** link they are taken to the BEGA Website Reports Publishing page where the following fields are displayed: o Logged in User (this will display the logged in user). o FDS Who Filed Extension Report (this will be a title field). o Selection Criteria (this will be a title field). o Reporting Year (this will be a dropdown field where a given year may be selected). **Required Field** There will be a “Generate Reports” button displayed at the bottom of the fields, as well as, a “Delete Reports” button. (When the user presses the “Generate Reports” button it executes a command for the report to be displayed. A PDF link is then made available to the user to view the report). **(See Appendix C)**	
		Y
5.3.5.2.7	**Letters and Mailing Labels** FDS Letters When the user clicks the FDS Letters link they are taken to the BEGA FDS Letters page where the following fields are displayed: o Logged in User (this will display the logged in user). o FDS Letters (this will be a title field). o Selection Criteria (this will be a title field). o Reporting year (this will be a dropdown field where a given year may be selected). **Required Field** o Agency (this will be a dropdown field of agencies, ANCs, and boards) o Date o Filers Without Email ID There will be a “View Letters” button and a “View Email Letter” button below the aforementioned fields. The “View Letters” button when pressed by the user will execute a command that shows all letters to users based upon the selected criteria. **(See Appendix B)** The “View Email Letter” when pressed will show the user the actual subject and body of the email without letter format to the user. **(See Appendix B)**	**N**

	A “View FDS Email Recipients List” button will appear at the bottom of the displayed email subject and body. When pressed, all recipients for that email will be displayed. **(See Appendix B)** A “Send FDS Letter Email to Recipients” button will be displayed below the email recipients list, which will send the email when pressed by the user.	
5.3.5.2.8	**Letters and Mailing Labels** FDS ANC Letters When the user clicks the FDS ANC Letters link they are taken to the BEGA FDS ANC Letters page where the following fields are displayed: o Logged in User (this will display the logged in user). o FDS ANC Letters (this will be a title field). o Selection Criteria (this will be a title field). o Reporting year (this will be a dropdown field where a given year may be selected). **Required Field** o Agency (this will be a dropdown field of agencies, ANCs, and boards) o Date o Filers Without Email ID There will be a “View Letters” button and a “View Email Letter” button below the aforementioned fields. The “View Letters” button when pressed by the user will execute a command that shows all letters to users based upon the selected criteria. **(See Appendix B)** The “View Email Letter” when pressed will show the user the actual subject and body of the email without letter format to the user. **(See Appendix B)** A “View FDS Email Recipients List” button will appear at the bottom of the displayed email subject and body. When pressed, all recipients for that email will be displayed. **(See Appendix B)** A “Send FDS Letter Email to Recipients” button will be displayed below the email recipients list, which will send the email when pressed by the user.	**N**
5.3.5.2.9	**Letters and Mailing Labels** FDS Candidate Letters When the user clicks the FDS Candidate Letters link they are taken to the BEGA FDS Candidate Letters page where the following fields are displayed: o Logged in User (this will display the logged in user). o FDS Candidate Letters (this will be a title field). o Selection Criteria (this will be a title field). o Reporting year (this will be a dropdown field where a given year may be selected). **Required Field** o Agency (this will be a dropdown field of agencies, ANCs, and boards) o Date o Filers Without Email ID There will be a “View Letters” button and a “View Email Letter” button below the aforementioned fields. The “View Letters” button when pressed by the user will execute a command that shows all letters to users based upon the selected criteria. **(See Appendix B)** The “View Email Letter” when pressed will show the user the actual subject	**N**

	and body of the email without letter format to the user. **(See Appendix B)** A "View FDS Email Recipients List" button will appear at the bottom of the displayed email subject and body. When pressed, all recipients for that email will be displayed. **(See Appendix B)** A "Send FDS Letter Email to Recipients" button will be displayed below the email recipients list, which will send the email when pressed by the user.	
5.3.5.2.10	**Letters and Mailing Labels** FDS Honorary Letters When the user clicks the FDS Honorary Letters link they are taken to the BEGA FDS Honorary Letters page where the following fields are displayed: o Logged in User (this will display the logged in user). o FDS Honorary Letters (this will be a title field). o Selection Criteria (this will be a title field). o Reporting year (this will be a dropdown field where a given year may be selected). **Required Field** o Agency (this will be a dropdown field of agencies, ANCs, and boards) o Date o Filers Without Email ID There will be a "View Letters" button and a "View Email Letter" button below the aforementioned fields. The "View Letters" button when pressed by the user will execute a command that shows all letters to users based upon the selected criteria. **(See Appendix B)** The "View Email Letter" when pressed will show the user the actual subject and body of the email without letter format to the user. **(See Appendix B)** A "View FDS Email Recipients List" button will appear at the bottom of the displayed email subject and body. When pressed, all recipients for that email will be displayed. **(See Appendix B)** A "Send FDS Letter Email to Recipients" button will be displayed below the email recipients list, which will send the email when pressed by the user.	**N**
5.3.5.2.11	**Letters and Mailing Labels** FDS Non Compliance Letters When the user clicks the FDS Non Compliance Letters link they are taken to the BEGA FDS Non-Compliance Letters page where the following fields are displayed: o Logged in User (this will display the logged in user). o FDS Non-Compliance Letters (this will be a title field). o Selection Criteria (this will be a title field). o Reporting year (this will be a dropdown field where a given year may be selected). **Required Field** o Agency (this will be a dropdown field of agencies, ANCs, and boards) o Date o Filers Without Email ID There will be a "View Letters" button and a "View Email Letter" button below the aforementioned fields. The "View Letters" button when pressed by the user will execute a command that shows all letters to users based upon the selected criteria. **(See Appendix B)**	**N**

	The “View Email Letter” when pressed will show the user the actual subject and body of the email without letter format to the user. **(See Appendix B)** A “View FDS Email Recipients List” button will appear at the bottom of the displayed email subject and body. When pressed, all recipients for that email will be displayed. **(See Appendix B)** A “Send FDS Letter Email to Recipients” button will be displayed below the email recipients list, which will send the email when pressed by the user.	
5.3.5.2.12	**Letters and Mailing Labels** FDS ANC Non Compliance Letters When the user clicks the FDS ANC Non Compliance Letters link they are taken to the BEGA FDS ANC Non-Compliance Letters page where the following fields are displayed: o Logged in User (this will display the logged in user). o FDS ANC Non-Compliance Letters (this will be a title field). o Selection Criteria (this will be a title field). o Reporting year (this will be a dropdown field where a given year may be selected). **Required Field** o Agency (this will be a dropdown field of agencies, ANCs, and boards) o Date o Filers Without Email ID There will be a “View Letters” button and a “View Email Letter” button below the aforementioned fields. The “View Letters” button when pressed by the user will execute a command that shows all letters to users based upon the selected criteria. **(See Appendix B)** The “View Email Letter” when pressed will show the user the actual subject and body of the email without letter format to the user. **(See Appendix B)** A “View FDS Email Recipients List” button will appear at the bottom of the displayed email subject and body. When pressed, all recipients for that email will be displayed. **(See Appendix B)** A “Send FDS Letter Email to Recipients” button will be displayed below the email recipients list, which will send the email when pressed by the user.	**N**
5.3.5.2.13	**Letters and Mailing Labels** FDS Candidate Non Compliance Letters When the user clicks the FDS Candidate Non Compliance Letters link they are taken to the BEGA FDS Candidate Non-Compliance Letters page where the following fields are displayed: o Logged in User (this will display the logged in user). o FDS Candidate Non-Compliance Letters (this will be a title field). o Selection Criteria (this will be a title field). o Reporting year (this will be a dropdown field where a given year may be selected). **Required Field** o Agency (this will be a dropdown field of agencies, ANCs, and boards) o Date o Filers Without Email ID There will be a “View Letters” button and a “View Email Letter” button below	**N**

	the aforementioned fields. The “View Letters” button when pressed by the user will execute a command that shows all letters to users based upon the selected criteria. **(See Appendix B)** The “View Email Letter” when pressed will show the user the actual subject and body of the email without letter format to the user. **(See Appendix B)** A “View FDS Email Recipients List” button will appear at the bottom of the displayed email subject and body. When pressed, all recipients for that email will be displayed. **(See Appendix B)** A “Send FDS Letter Email to Recipients” button will be displayed below the email recipients list, which will send the email when pressed by the user.	
5.3.5.2.14	**Letters and Mailing Labels** Mailing Labels When the user clicks the Mailing Labels link they are taken to the BEGA FDS Mailing Labels page where the following fields are displayed: o Logged in User (this will display the logged in user). o FDS Mailing Labels (this will be a title field). o Selection Criteria (this will be a title field). o Reporting year (this will be a dropdown field where a given year may be selected). **Required Field** There will be a “View Labels” button below the aforementioned fields. When pressed by the user, a command will be executed which shows mailing labels based on the selected year. **(See Appendix B)**	**N**
5.3.5.2.15	**Letters and Mailing Labels** Mailing Labels (Non-Compliance) When the user clicks the Mailing Labels (Non-Compliance) link they are taken to the BEGA FDS Non-Compliance Mailing Labels page where the following fields are displayed: o Logged in User (this will display the logged in user). o FDS Non-Compliance Mailing Labels (this will be a title field). o Selection Criteria (this will be a title field). o Reporting year (this will be a dropdown field where a given year may be selected). **Required Field** There will be a “View Labels” button below the aforementioned fields. When pressed by the user, a command will be executed which shows mailing labels based on the selected year. **(See Appendix B)**	**N**
5.3.5.2.16	**Letters and Mailing Labels** Mailing Labels (ANC Non-Compliance) When the user clicks the Mailing Labels (ANC Non-Compliance) link they are taken to the BEGA FDS ANC Non-Compliance Mailing Labels page where the following fields are displayed: o Logged in User (this will display the logged in user). o FDS ANC Non-Compliance Mailing Labels (this will be a title field). o Selection Criteria (this will be a title field). o Reporting year (this will be a dropdown field where a given year may be selected). **Required Field**	**N**

	There will be a “View Labels” button below the aforementioned fields. When pressed by the user, a command will be executed which shows mailing labels based on the selected year. **(See Appendix B)**	
5.3.5.2.17	**Letters and Mailing Labels** Mailing Labels (Candidate Non-Compliance) When the user clicks the Mailing Labels (Candidate Non-Compliance) link they are taken to the BEGA FDS Candidate Non-Compliance Mailing Labels page where the following fields are displayed: o Logged in User (this will display the logged in user). o FDS Candidate Non-Compliance Mailing Labels (this will be a title field). o Selection Criteria (this will be a title field). o Reporting year (this will be a dropdown field where a given year may be selected). **Required Field** There will be a “View Labels” button below the aforementioned fields. When pressed by the user, a command will be executed which shows mailing labels based on the selected year. **(See Appendix B)**	**N**
5.3.5.2.18	**Admin Tasks** Agency Details When the user clicks on the Agency Details link they are taken to the FDS Agency List page. All agencies, ANCs, Boards, and Commissions will be displayed along with their associated address. Each entity will be presented as a hyperlink. Clicking on the hyperlink will provide contact information for the entity and will allow the user to modify this information.	**N**
5.3.5.2.19	**Admin Tasks** Modify FDS Letters When the user clicks on the Modify FDS Letters link, they are taken to the BEGA Letter Maintenance page. The user will be able to modify the letter subject and the letter body.	**N**
5.3.5.2.20	**Admin Tasks** Modify FDS ANC Letters When the user clicks on the Modify FDS ANC Letters link, they are taken to the BEGA Letter Maintenance page. The user will be able to modify the letter subject and the letter body.	**N**
5.3.5.2.21	**Admin Tasks** Modify FDS Candidate Letters When the user clicks on the Modify FDS Candidate Letters link, they are taken to the BEGA Letter Maintenance page. The user will be able to modify the letter subject and the letter body.	**N**
5.3.5.2.22	**Admin Tasks**	**N**

	Modify FDS Honorary Letters When the user clicks on the Modify FDS Honorary Letters link, they are taken to the BEGA Letter Maintenance page. The user will be able to modify the letter subject and the letter body.	
5.3.5.2.23	**Admin Tasks** Modify FDS Non Compliance Letters When the user clicks on the Modify FDS Non Compliance Letters link, they are taken to the BEGA Letter Maintenance page. The user will be able to modify the letter subject and the letter body.	**N**
5.3.5.2.24	**Admin Tasks** Modify FDS ANC Non Compliance Letters When the user clicks on the Modify FDS ANC Non Compliance Letters link, they are taken to the BEGA Letter Maintenance page. The user will be able to modify the letter subject and the letter body.	**N**
5.3.5.2.25	**Admin Tasks** Modify FDS Candidate Non Compliance Letters When the user clicks on the Modify FDS Candidate Non Compliance Letters link, they are taken to the BEGA Letter Maintenance page. The user will be able to modify the letter subject and the letter body.	**N**
5.3.5.2.26	**Admin Tasks** Modify FDS Email Notifications When the user clicks on the Modify FDS Email Notifications link, they are taken to the FDS Email Notifications page. The user will be able to modify any Email ID, as well as, enable or disable any email notifications.	

6. Functional Requirements – Internal Systems – Lobbyist Filing System – Current

6.1 Lobbyist e-Filing – External User Role

Req ID	Requirements	Change Required? (Y/N)
6.2.1	After logging in the user is taken to the Main menu page where the following six (6) hyperlinks to provided functionality are present: • New Registration • Re-Registration • Campaign Contributions • Fine payments • Change Password • View/Edit Contact Information The user is also presented with a “My Registrations” section, which displays any of their registrations in tabular format. The table will provide the following fields: • Registrant Name • Client Name • Reporting Year • E-Filing • Status • Edit Registration (if applicable).	**N**

6.2.2	**New Registration**
	
	After clicking the “New Registration” link, the user is taken to the Lobbyist Registration screen to begin the registration process. The user is presented with the following fields:
	
	• Reporting Year
	• Lobbyist Category
	  • For-Profit ($250) – Button selector for Lobbyist Category
	  • Non-Profit ($50) – Button selector for Lobbyist Category
	• Name of Registrant
	• Registrant Type
	  • Lobbyist – Button selector for Registrant Type
	  • Lobbying Entity – Button selector for Registrant Type
	  • Client – Button selector for Registrant Type
	• Email
	• Daytime Telephone Number
	• Cellular Telephone Number
	• Street Address (Permanent Address field)
	• City (Permanent Address field)
	• State (Permanent Address field)
	• Zip Code (Permanent Address field)
	• Street Address (Temporary Address field)
	• City (Temporary Address field)
	• State (Temporary Address field)
		Y

	• Zip Code (Temporary Address field) After completion of the fields, the user clicks the “Save and Continue to next Step” button. The user is taken to **Screen 2 - Lobbyist Working for Registrant** (See Appendix D). Screen 2 will allow the user to add a new Lobbyist working for the Registrant. After the user moves from Screen 2 they are taken to **Screen 3- Client of Registrant** (See Appendix D). On this screen, the following is noted: *(when Registrant is a Lobbyist and/or Lobbying Entity)* ***Note:*** *Registrants must file a separate Lobbyist Registration Form and Lobbyist Activity Report for each client.* Completion of Screen 3, takes the user to **Screen 4 – Terms of Compensation** (See Appendix D). The user will be able to add their “Hourly”, ‘Annual Fee”, and “Salary” information. The user will also be able to add their Duration of Engagement. Completion of Screen 4, takes the user to **Screen 5 – Lobbyist Matters(s)** (See Appendix D). The user will be able to add all matters on which they expect to lobby on behalf of their identified client as part of this registration. Submission of the information on Screen 5 takes the user to the **Review Registration** screen (See Appendix D), which allows them to view all input information. After the user reviews their registration, they are prompted to proceed to the Payment Screen to complete the registration. The **Payment Screen** (See Appendix D) is then made available to the user so that payment may be submitted and registration completed. Any required payment fields not completed will be flagged requiring the user to complete.	
6.2.3	**Re-Registration** The Re-registration screen will allow the user to re-register given they have any active registrations.	**N**
6.2.4	**Campaign Contributions** The Campaign Contributions screen will present the user with the following sections: • File a New Report • Resume Filing • File an Amendment • View Previously Filed Reports The **File a New Report** section allows the user to view a new report; a not	**N**

	previously submitted a report(s); or reports that the user has begun filing, but has not submitted.	

6.2 Lobbyist e-Filing – Administrator Role

Req ID	Requirements	Change Required? (Y/N)
6.3.1	**User Registrations** User registration functionality will be made available via the Admin Menu where the user may create new users or search for registered users (See Appendix E). Clicking the **User Registration Link**, the user is taken to the Lobbyist User Registration screen (See Appendix E). The following fields are made available: o Name of Registrant (Text field for name of registrant) o E-mail (Text Field for email address) o Street Address (Text field for street address) o City (Text field for city name) o State (Dropdown list populated with states) o Zip Code (Text field for zip code) o Cellular Telephone Number (Text field for cellular number) Two (2) buttons, “Register” and “Cancel” o Pressing the “Register” button registers the registrant user. o Pressing the “Cancel: button returns the user to the previous screen. Clicking the **Search Registered Users Link** sends the user to the Search Registered Users screen (See Appendix E). o Registered users will be displayed in table format with the following fields: “Registrant Name”, “Username”, “Password”, “PIN Number”. o Registrant Names will be provided as links to a form with all registrant contact information. o A search field will be made available at the top of the page. Typing in and entering a name will retrieve Registrant information if applicable. o “Search” and “Cancel” buttons will be provided. • When the user presses the “Search” button a command is executed which searched for whichever user that has been placed in the search box. • When the user presses the “Cancel” button, they are returned to the previous screen.	**Y**
6.3.2	**Registrations / Filings** Clicking the Registrations / Filings link, the user is taken to the “Search Lobbyist” screen (See Appendix E).	**Y**

	The following search fields will be provided: • Filing Year – (text Field) • Registered User – (text Field) • Name of Registrant (Lobbyist/Lobbying Entity/Client) – (Text field) Two (2) buttons are provided below the search fields to execute the search: • Search (will execute the search command when pressed) • Cancel (will return the user to the previous screen) Search results will be provided in table format (See Appendix E) with the following fields: • Registered User • Registrant Name (Hyperlink to provide registrant/client contact information). • Permanent Address • Payment Received • File (hyperlink to file an Activity Report)	
6.3.3	**Manage Letters** The Manage Letters screen will provide the user with three (3) options for: • Managing Letter Text • Generate Reminder Letters, Mailing Labels and Email • Generate Non-Compliance Reminder letters, Mailing Labels and Email Each option will provide a hyperlink to the respective screen used to execute that specific functionality. • The Manage Letter Text screen (See Appendix E) allows the user to update form letters, which are sent to registrants. • The Generate Reminder Letters, Mailing Labels and Email screen (See Appendix E) allows the user, based on the criteria of selected reports and associated letters to Generate Reminder Letters, Generate Mailing Labels for associated registrants, and Generate Emails for delivery to associated registrants. • The Generate Non-Compliance Reminder letters, Mailing Labels and Email screen (See Appendix E) Generate Non-Compliance Letters, Generate Mailing Labels for associated registrants, and Generate Emails for delivery to associated registrants.	**Y**
6.3.4	**Reports** The Manage Reports screen will provide the user with three (3) options for: • Registration Report	**N**

	• Filers Report
	• Non-Filers Report
	
	Each option will provide a hyperlink to the respective screen used to execute that specific functionality.
	
	• The Registration Report (See Appendix E) will be used to view the Registration Report. The following fields will be available in the report:
	  • Registered Users
	  • Registrant Name
	  • Client Name
	  • Address
	  • Email
	
	• The Filers Report (See Appendix E) will be used to view the Filers Report. The following fields will be available in the report:
	  • Registered User
	  • Registrant Name
	  • Client Name
	  • Email
	
	• The Non-Filers Report (See Appendix E) will be used to view the Non-Filers Report. The following fields will be available in the report:
	  • Registered User
	  • Registrant Name
	  • Client Name
	  • Email	

6.3.5	**Payments**
	
	The Manage Payments screen will provide the user with four (4) options for:
	
	• Make a Payment
	• View Payments
	• Lobbyist Registration Fees
	• Lobbyist Late Fines
	
	Each option will provide a hyperlink to the respective screen used to execute that specific functionality.
	
	• The Make a Payment screen (See Appendix E) will allow the user to make a payment. The following fields will be available:
	  • Payment Description
	  • Amount to Charge
	  • Card Type
	  • Card Number
	  • Name on Card
	  • Expiration (Month/Year)
		Y

	• Card Security Code • The View Payments screen (See Appendix E) will allow the user to view payments, which have been made. The following fields will be available: • Description • Description (in results table). • Amount (in results table). • Date Submitted (in results table). • Status (in results table). • Payment Method (in results table). • The Lobbyist Registration Fees screen (See Appendix E) will allow the user to view Lobbyist Registration Fees. The following fields will be available: • From Date • To Date • Registrant Name (in results table). • Client Name (in results table). • Reporting year (in results table). • Amount (in results table). • Receipt Date (in results table). • The Lobbyist Late Fines screen (See Appendix E) will allow the user to view Lobbyist Late Fines. The following fields will be available: • Select a Report (dropdown reports list). • Registrant Name (in results table). • Client Name (in results table). • Amount (in results table). • Receipt Date (in results table).	
6.3.6	**Fine Payments** The Fine Payments screen will provide a link to Non-Filers Fine payments. This provides the user with functionality to view/override Non-Filers' fine amounts. • The Non-Filers Payment Screen (See Appendix E) will provide the following fields: • Reporting Period (dropdown list of Reporting Periods). • Registrant Name (in results table). • Submit Date (in results table). • Late By (days) – (in results table). • Fine Amount (in results table). • Overrided Amount (in results table). • Fine Paid (in results table). • Override (link to Override function). • Pay Now (link to Payment function).	**Y**

6.3.7	**Help Contents** The Help Contents screen will provide the user with two (2) options for: • Manage Help Contents – LOB • Manage Help Contents – FDS The Manage Help Contents – LOB screen (See Appendix E) will present all Help text subject areas made available to Lobbyist users and allow that text to be modified. The Manage Help Contents – FDS screen (See Appendix E) will present all Help text subject areas made available to FDS users and allow that text to be modified.	**N**
6.3.8	**Training Videos** The Manage Training Videos & PowerPoint screen (See Appendix E) will provide the following fields and information: • Public Display Name (name that will be displayed to the Public). • Upload PowerPoint (allows user to upload PowerPoint file). • Upload Video Zip file (allows user to upload a compressed video file). • BEGA Lobbyist Filing & Reporting Training (link to uploaded training video(s)). • Video Zip File Creation Instructions (provides the user with step-by-step instructions necessary to create the compressed file).	**N**
6.3.9	**Manage Holidays** The Manage Holidays screen (See Appendix E) allows the user to input DC Government holidays. The following fields are presented to the user: • Holiday Date • Holiday Title • Search by Year • Holiday Date (in results table…provides link to submitted holiday for user modification to the record). • Holiday Title (in results table).	**N**
6.3.10	**Email Logs** The Email Logs Screen (See Appendix E) will provide the user with hyperlinks to a list of all email subjects, which have been sent to external users. Email Log Details will provide the following: • Email Subject • Email Body • Recipient Information: • Registered User (in table results). • Registrant Name (in table results).	**Y**

	• Client Name/FDS ID (in table results). • Email ID (in table results). • Mail Sent Date & Time (in table results). • Status (in table results).	

7. Functional Requirements – BEGA e-Filing System (Public Facing) – Enhancements & New

Req ID	Requirements	New Req.? (Y/N)	Referenced Req.
7.1	All Services should be removed from the navigation pane when redundant on the page.	Y	General
7.2	Lobbyist year search criteria should end at 2012.	Y	4.1.2
7.3	Committee Name should be changed to lobbyist…Searchable field by letter is needed. Download data (data dump csv/excel required)	Y	4.1.5
7.4	Change Committee name to Lobbyist Name…Change Comp Registrant to Comp Registrant/Client	Y	4.1.5.1
7.5	Searchable field for filer name needed similar to lobbyist as stated in Req. 7.3.	Y	4.1.5.2
7.6	Change date fields to dropdown calendar.	Y	4.3.1.1
7.7	Change Filer Types to ANC, Candidate, Public Official	Y	4.3.1.1
7.8	Change title heading to 'Lobbyist Registration & Activity Reports"	Y	4.4.1
7.9	REMOVE ALL LOBBYIST INFORMATION FROM PUBLIC-FACING FDS SYSTEM.	Y	General
7.10	All Lobbyist data prior to 2012 will be archived.	Y	General
7.11	A download link to download Lobbyist data prior to 2012 will be placed on any newly developed Lobbyist application.	Y	General
7.12	Search results should also return any associated e-filed documents when a search for Registration Statements or Activity Reports is performed.	Y	4.4.3
7.13	Add "Agency" field.	Y	4.5.2
7.14	Add searchable field where results are identified as each letter is typed.	Y	4.5.2
7.15	Allow sort by Agency.	Y	4.5.5
7.16	Combine Lobbyist Activity and Communication results,	N	4.6.4
7.17	Combine Lobbyist Activity and Communication results,	N	4.6.4.2
7.18	Remove all Lobbyist reports from the FDS system.	Y	4.7.1
7.19	Change "BEGA" to "FDS Reports and Summaries".	N	4.7.1
7.20	Remove all narrative text on page.	Y	4.7.1
7.21	Remove Lobbyist reports.	Y	4.7.2
7.22	All narrative text must be revised.	N	4.7.3

8. Functional Requirements – Internal Systems – Financial Disclosure Filing System – Enhancements & New

Req ID	Requirements	New Req.?	Referenced

		(Y/N)	Req.
8.1	User should log in user their Employee ID and LDAP password.	Y	5.1.1
8.2	User should be able to modify own information(position) instead of contacting BEGA.	Y	5.2.2
8.3	Agency field will be a populated dropdown list.	Y	5.2.2
8.4	“Former Agency Name” will be an agency dropdown list.	Y	5.2.2
8.5	‘Yes/No” should be on question page.	Y	5.2.2
8.6	A selection of “Yes” takes user to next screen to add information.	Y	5.2.2
8.7	REMOVE option to View/Modify employee information.	Y	5.2.3
8.8	Role based access required.	Y	5.3.1
8.9	Super Administrator role needed to add new letters to the system.	Y	5.3.1
8.10	Administrator should have document upload capability.	Y	5.3.1
8.11	Remove all Lobbyist Information.	Y	5.3.5
8.12	Remove links on navigation bar.	Y	5.3.5
8.13	Remove Imaging System links and functionality.	Y	5.3.5
8.14	Dropdown list required for all Registration, Reports, Letters and Mailing Labels, and Admin Tasks.	Y	5.3.5.2
8.15	Allow user to filter labels by agency.	Y	5.3.5.2.14

9. Functional Requirements – Internal Systems – Lobbyist Filing System – Enhancements & New

Req ID	Requirements	New Req.? (Y/N)	Referenced Req.
9.1	A dropdown list should be provided for Reporting Year, Lobbyist Category, and Registrant Type.	Y	6.2.2
9.2	New Registrants should be able to access registrant name information from the BEGA home page.	Y	6.3.1
9.3	Registration year should be provided as a dropdown.	Y	6.3.1
9.4	Registration year should not exceed the current registration year.	Y	6.3.1
9.5	Client field should associate the registrant with the client.	Y	6.3.1
9.6	“Add New” functionality required as part of dropdown listing all previously registered clients.	Y	6.3.1
9.7	Only one registrant detail should be retrieved when selected.	Y	6.3.2
9.8	Add “Registrant Name” and “Client”. REMOVE “Registered User”.	Y	6.3.2
9.9	User will be able to upload documents.	Y	6.3.3
9.10	Checking account information is required.	Y	6.3.5
9.11	Total Amount should also show total amount by reporting year.	Y	6.3.5
9.12	Add note column to report.	Y	6.3.6
9.13	Search by user functionality should be required.	Y	6.3.6
9.14	Search by user functionality should be required.	Y	6.3.10
9.15	FDS and Lobbyist logs must be separated.	Y	6.3.10

10. APPENDIX B: FDS – IMAGES OF LETTERS AND MAILING LABELS

The following images are of letters and mailing labels currently generated by system administrators for both Lobbyist and Financial Disclosure Statement (FDS) Filers.

LOBBYIST LETTERS AND MAILING LABELS

GOVERNMENT OF THE DISTRICT OF COLUMBIA
BOARD OF ETHICS AND GOVERNMENT ACCOUNTABILITY

Office of Government Ethics

August 02, 2016

AARP
AARP
601 E St., NW, Suite A1-200
Washington, DC 20049

RE: Transfer of Lobbyist Reporting Program

This letter is to inform you that you are no longer required to file your lobbyist registration and activity reports (OCF Forms 25 &26) with the Office of Campaign Finance.

Pursuant to the "Board of Ethics and Government Accountability Establishment and Comprehensive Ethics Reform Amendment Act of 2011" (the Ethics Act of 2011" or the Act"), the Office of Campaign Finance is no longer responsible for the enforcement of the lobbyist reporting program which was formerly administered in accordance of D.C. Official Code Sections 1-1105.04 & 1-1105.05.

The Ethics Act of 2011 prescribes that the authority of the OCF to require the filing of the lobbyist registration and activity reports has been repealed. The Act establishes the District of Columbia Board of Ethics and Government Accountablilty (BEGA), effective October 1, 2012, as the repository for the filing of the lobbyist reports. The Act requires that the registration report continue to be filed on January 15th and the activity reports be filed on January 10th & July 10th commencing in 2013. The Board of Ethics (www.bega.dc.gov) is located at 441 4th Street, NW, Washington, D.C., Suite 830 South and can be reached by telephone at (202) 481-3411 or email, bega@dc.gov. BEGA has informed us that new registration forms and activity report forms will be posted on their website, or may be picked up at their offices. Electronic filing will not be immediately available, so all forms must be manually completed and submitted for processing by BEGA. In no way does the change to the law relieve lobbyists from filing their registration forms and activity reports. Only the receiving entity has changed.

Thank you for your cooperation and due diligence in filing your lobbyist reports in previous years. If you have any questions, please contact Wesley Williams, Public Affairs Manager at (202) 671-0551 or wesleyw.williams@dc.gov.

Sincerely,

DARRIN P. SOBIN
Director of Government Ethics
Board of Ethics and Government Accountability

441 4th Street, N.W., Suite 830 South, Washington, D.C. 20001, Tel. (202) 481-3411

Lobbyist Letters (Fig. 1)

Lobbyist Non Compliance Letters (Fig. 2)

GOVERNMENT OF THE DISTRICT OF COLUMBIA
BOARD OF ETHICS AND GOVERNMENT ACCOUNTABILITY

Office of Government Ethics

August 02, 2016

American Management Corporation
Enhanced Capital Partners, Inc.
1455 Pennsylvania Avenue NW
Washington, DC 20004

RE: Transfer of Lobbyist Reporting Program

A review of our records reflect that you may have failed to file the January 10th, 2012 Lobbyist Activity Report (covering the period of July 2011 through December 2011), as required by the District of Columbia Campaign Finance Reform and Conflict of Interest Act of 1974, as amended (the Act), D.C. Official Code §1-1101.01 et seq. (2001 Edition).

D.C. Official Code §1-1105.05(a) requires each registrant to file bi-annually, within the first 10 days of January and July, a sworn report concerning his or her lobbying activities during the previous six month period. If the registrant is not an individual, an authorized officer or agent must sign the form. In addition, a separate activity report must be filed for each person from whom a registrant receives compensation. Finally, when a registrant ceases lobbying activities, the Office of Campaign Finance must be notified within fifteen (15) days of discontinuance of those activities.

Your apparent failure to file this report may result in the referral of this matter for an informal hearing, and the imposition of civil penalties. Therefore, please file the January 10th, 2012 Lobbyist Activity Report on or before Tuesday, February 14, 2012.

The Electronic Filing and Reporting System (EFRS) is currently available via our website (www.ocf.dc.gov) for the electronic submission of OCF Form 26, the "Lobbyist Activity Reporting Form" (Activity Report). An electronic submission of the Activity Report is considered timely filed if submitted by midnight of the prescribed filing date. Further you may now file electronically without the obligation of providing a signed copy of the report by certifying it with a PIN number. Below you will find the necessary information to file on line at our website. Please use the login ID and password to enter the electronic filing system. The PIN number will be used once you have completed your report and are ready to certify the final submission.

Be advised that utiling the EFRS for the January 10th Report is optional at this time. If you wish to file on paper, you may download OCF Form 26 from our website under "Downloadable Forms".

If you have any questions regarding this matter, please contact Sonya Lake, Public Affairs Specialist, at (202) 671-0555 or sonya.lake@dc.gov.

Sincerely,

DARRIN P. SOBIN
Director of Government Ethics
Board of Ethics and Government Accountability

441 4th Street, N.W., Suite 830 South, Washington, D.C. 20001, Tel. (202) 481-3411

Lobbyist Registration Fee Non Compliance Letters (Fig.3)

GOVERNMENT OF THE DISTRICT OF COLUMBIA
BOARD OF ETHICS AND GOVERNMENT ACCOUNTABILITY

Office of Government Ethics

August 02, 2016

Pepco Energy Services
Pepco Energy Services
1300 North 17th Street, Suite 1600,
Arlington, VA 22209

NOTICE OF NON-COMPLIANCE, FAILURE TO PAY THE REGISTRATION FEES FOR 2012

Dear Registrant:
This is to indicate that you have not paid the Registration fee. Pls pay the fees.

Login Details

Login ID	:	**PESEnergyServic**
Password	:	**1600N17th**
PIN	:	**9196**

441 4th Street, N.W., Suite 830 South, Washington, D.C. 20001, Tel. (202) 481-3411