



# Stage 1 Business Analysis

California Department of Technology, SIMM 19A.3 (Ver. 3.0.8, 02/01/2022)

## 1.1 General Information

**1. Agency or State entity Name: 0890 - Secretary of State**

If Agency/State entity is not in the list, enter here with the [organization code](#).

[Click or tap here to enter text.](#)

**2. Proposal Name and Acronym: CAL-ACCESS Replacement System (CARS)**

**3. Proposal Description: (Provide a brief description of your proposal in 500 characters or less.)**

The Secretary of State (SOS) proposes to improve reliability, disaster recovery, and service to the public by replacing the current CAL-ACCESS system with one that is based on a more modern, flexible architecture. The State Legislature has mandated that the SOS replace CAL-ACCESS (SB 1349 Hertzberg). CAL-ACCESS is the state's campaign and lobbying information system where candidates, political committees, and lobbyists file detailed financial disclosures.

**4. Proposed Project Execution Start Date: 3/18/2024**

**5. S1BA Version Number: Version 1**

## 1.2 Submittal Information

**1. Contact Information**

Contact Name: [Margie Hieter](#)

Contact Email: [MHIETER@SOS.CA.GOV](mailto:MHIETER@SOS.CA.GOV)

Contact Phone: [916.517.8609](tel:916.517.8609)

**2. Submission Type: New Submission**

If Withdraw, select Reason: [Choose an item.](#)

If Other, specify reason here: [Click or tap here to enter text.](#)

**Sections Changed, if this is a Submission Update: (List all sections changed.)**

[Click or tap here to enter text.](#)

**Summary of Changes: (Summarize updates made.)**

[Click or tap here to enter text.](#)

3. Attach [Project Approval Executive Transmittal](#) to your email submission.
4. Attach [Stage 1 Project Reportability Assessment](#) to your email submission.

## 1.3 Business Sponsorship

### 1. Executive Champion (Sponsor)

Title: [Deputy Secretary of State for Operations](#)

Name: [Reggie Fair](#)

Business Program Area: [Executive Office](#)

### 2. Business Owner

Title: [Chief, Political Reform Division](#)

Name: [Margie Hieter](#)

Business Program Area: [Political Reform Division](#)

### 3. Product Owner

Title: [Division Chief](#)

Name: [Margie Hieter](#)

Business Program Area: [Political Reform Division](#)

*TIP: Copy and paste or click the + button in the lower right corner on any section to add additional Executive Champions, Business Owners, or Product Owners with their related Business Program Areas as needed.*

## 1.4 Stakeholder Assessment

The Stakeholder Assessment is designed to give the project team an overview of communication channels that the state entity needs to manage throughout the project. More stakeholders may result in increased complexity to a project.

1. Indicate which of the following are interested in this proposal and/or the outcome of the project. (Select 'Yes' or 'No' for each.)

State Entity Only: Yes

Other Departments/State Entities: Yes

Public: Yes

Federal Entities: No

Governor's Office: Yes

Legislature: Yes

Media: Yes

Local Entities: Yes

Special Interest Groups: Yes

Other: Choose Yes or No.

## 2. Describe how each group marked 'Yes' will be involved in the planning process.

**Stakeholders and their Involvement in Project Planning:** CAL-ACCESS is important to all Californians who have an interest in running for public office, who currently hold a public office, and those who engage in lobbyist activities. The Political Reform Act of 1974 (PRA) requires the disclosure of campaign contributions and expenditures, and state lobbying activity. External stakeholders who have significant influence on the development of the new CAL-ACCESS system include the Legislature, the Fair Political Practices Commission (FPPC), the Franchise Tax Board (FTB), the Department of Finance, the software vendor community that provides services specific to CAL-ACCESS filers, local entities that collect campaign contribution information, and the media. In addition to other involvement described below, all stakeholders will be informed and included in the project planning process through project status updates posted to the CARS page of the SOS website.

**Legislature and Department of Finance:** The Legislature has given direction into planning the new system in the bills it passed containing detailed requirements for the system (SB 1349 and SB 1239). During the project planning phase, the Legislature and the Department of Finance will exercise oversight and will be updated on the status of the project via quarterly Joint Legislative Budget Committee reports and through other reports, as they request.

**Other State Entities:** The FPPC and FTB are partner agencies with the SOS' Political Reform Division (PRD) for the purpose of statewide campaign finance disclosure and state level lobbying activity. Filers register and file with PRD, the FTB audits those filings, and the FPPC enforces the PRA based on audit findings and referrals related to filing violations from PRD and third parties (for example, a candidate's opponent).

During the planning phase, the FPPC and FTB will participate in regularly scheduled stakeholder meetings for requirements gathering. In addition, PRD staff consults with FPPC staff on a bi-monthly basis, and FTB staff, as needed, and will consult with them on issues or questions about project planning that affect those partners.

**External Stakeholders:** External stakeholders are those representing filers and those representing the public. Filer representatives include campaign treasurers and attorneys and software vendors that provide campaign finance and lobbying reporting software. Public representatives include good government organizations and the media who are interested in clear and timely public disclosure of campaign finance and lobbying information.

These external stakeholders have been involved in planning the new system from the outset in 2016, so important stakeholder input describing their needs and wants for the new system has been received and incorporated by the SOS in the requirements for CARS. During the planning phase, the SOS will hold stakeholder meetings with the vendor community, lobbyist filers, political treasurers or political attorneys to provide updates on the CARS project and to receive additional input on requirements. Given that the vast majority of campaign and lobbying filings are submitted to the SOS through outside vendors, the vendor community and the SOS staff are in close communication and contact regarding the new system.

**Local Entities:** Cities and counties depend on PRD for approving all committee formations, including committees that file locally. Local filing entities also follow direction from the FPPC and have a vested interest in filing processes at the state level that the FPPC is involved in – including how CAL-ACCESS functions. The Legislature has made several efforts to include some or all local filings in CAL-ACCESS. Finally, local filing entities that have electronic filing software are required to use filing formats prescribed by the Secretary of State that are developed as a component of CAL-ACCESS.

Most local entities will track the CARS project through project status updates posted to the SOS website. They may participate in online meetings available to stakeholders.

## 1.5 Business Program

- 1. Business Program Name:** California Automated Lobbyist and Campaign Contribution and Expenditure Search System (CAL-ACCESS).
- 2. Program Background and Context:** (Provide a brief overview of the entity’s business program(s) current operations.)

### *Project background*

The CAL-ACCESS system is outdated and relies on system components and infrastructure that cannot be upgraded. The system is a conglomeration of component applications built on now-obsolete technologies.

The “CAL-ACCESS Replacement System” (CARS) project was legislatively established in 2016 and after two attempts to develop a replacement system was unable to release a replacement system to the public within the approved project schedule. In response to the project’s challenges, the SOS collaborated with the California Department of Technology (CDT) to engage a consultant to provide an independent assessment of the project’s overall health. The assessment concluded that the replacement system was not architected correctly, contained deficiencies in the quality of the replacement system, and did not follow standard project management best practices. The ultimate recommendation provided in the independent assessment report was to re-initiate the project and conduct a new procurement. The Secretary accepted the independent assessment recommendations and planning, including training and change management efforts, began for building a new CARS Project. Therefore, this new iteration of the CARS project starts from the perspective of identifying the past obstacles that prevented the release of a new system, strives to learn from past mistakes and takes specific actions to follow best practices in project management, data governance, and vendor engagement to move the project forward.

The current CAL-ACCESS system is mission critical for PRD and to satisfy several provisions of the PRA. It is a conglomeration of component applications that were developed at different times using multiple, now-obsolete, coding languages, platforms, and technologies. The current campaign finance and lobbying activity process is a paper/File Transfer Protocol (FTP)/online hybrid model that results in inefficient (often manual) processes, duplicate efforts, sub-optimal data quality, and public disclosure reporting that does not meet the needs of many of the PRD stakeholders.

Several factors make replacing CAL-ACCESS imperative, including:

- Program business operations are negatively affected by lack of data integrity.
- Program business operations are at risk due to an old, unsupported information technology platform.
- PRD and stakeholders have limited information access and reporting capabilities.

### *Historical context*

In 1974, California voters approved Proposition 9, the Political Reform Act of 1974 (PRA). The PRA requires, among other things, the disclosure of campaign contributions and expenditures, and state lobbying activity. The requirements are intended to ensure: "Receipts and expenditures in election campaigns should be fully and truthfully disclosed in order that the voters may be fully informed and improper practices may be inhibited"; and "The activities of lobbyists should be regulated and their finances disclosed in order that improper influences will not be directed at public officials."

In 1997, the PRA was amended to include the Online Disclosure Act of 1997, a measure that paved the way for electronic and online submission of campaign and lobbying disclosure information over the Internet. This Act had the following two primary objectives: "Providing greater public access to vitally important Information" and "[t]he gradual elimination of paper filings of

campaign finance and lobbying activity statements and reports."

The Online Disclosure Act led the SOS to develop and deploy a public website called the California Automated Lobbyist Activity and Campaign Contribution and Expenditure Search System (CAL-ACCESS), which is the public's window into California's campaign disclosure and lobbying financial activity.

The FPPC, established in 1974, has primary responsibility for the impartial administration, implementation, and enforcement of the PRA. The FPPC works closely with the SOS, which is the primary filing office for state campaign and lobbying disclosure documents required under the PRA. The SOS and FPPC also work closely with the FTB, which is responsible for carrying out mandatory and random audits of filers and the disclosure data filed with the SOS.

PRD administers the state filing requirements as set forth in the PRA. To assure the highest standards of data integrity and timeliness, the PRD was established within the SOS. The PRD, staffed with 35 full-time positions, conducts a broad range of program activities to facilitate and monitor compliance with reporting requirements, and to provide public access to all data and filings. Over the last two-year election years, the PRD has averaged approximately 119,000 campaign and lobbying filings in election years and 77,000 campaign and lobbying filings in non-election years. Since 1999, the earliest stages of CAL-ACCESS development, close to 2 million filings have been processed. A filing is a report or statement that can range in size from a single page to thousands of pages.

The previous attempts to develop a CAL-ACCESS replacement system suffered from underestimations of the complexity of the PRA which dictates the inter-relationships between historical and current filings, and the time for which such filings must remain publicly accessible. Another challenge faced with the previous implementation attempts was creating a system with a secure interface capable of accepting digital signatures and online payments.

### **3. How will this proposed project impact the product or services supported by the state entity?**

A CAL-ACCESS replacement system built on a flexible and technologically current platform will improve the total customer experience for all external and internal customers. Providing the capability for external stakeholders to submit required filings using standardized data fields easily and intuitively will reduce the amount of time needed to submit such filings, reduce the amount of time PRD needs to review and approve such filings, and improve the customer experience.

A system that provides a variety of commonly requested information in a standardized reporting format and allows for ad-hoc queries will provide all Californians the ability to determine details easily and quickly about candidate filings and disclosure statements. This type of reporting capability will reduce the number of daily telephone calls placed to the Secretary's office and will shorten the time within which the public can access the information needed.

From a back-office or internal PRD perspective, having a standardized and ad-hoc reporting

mechanism will empower staff to develop such reports designed to improve their ability to identify late filers and other filing issues and take appropriate actions to notify filers to resolve the issues.

Many categories of filers are subject to paying annual fees. A robust reporting mechanism will allow PRD to easily identify such filers and create a communication to inform filers of the upcoming fee due date. Similarly, PRD will be able to easily identify filers who did not file in a timely manner and create a communication to inform them of fines and penalties due.

Filing requirements constantly change due to legislative updates, FPPC regulations, and FPPC guidance including updated disclosure forms. PRD expects a new system will unleash a flurry of new requirements to meet the pent-up demand for such changes. A system capable of being updated to recognize new or modified data fields and new relationships between data fields will empower PRD to quickly and easily update the system to keep pace with changing requirements. In turn, this provides filers the opportunity to adhere to legislation changes.

Campaign and lobbying registration and filing disclosures are time sensitive. A new system that performs data validation on filings will reduce the amount of time it takes for filers to be informed of mis-filed data, will reduce the amount of time it takes for PRD staff to analyze, and review submitted filings, will potentially reduce the number of fines and penalties assessed to filers, and result in an overall improvement in filers ability to file timely and accurately. Ultimately, the job of PRD is to assist filers in their ability to file accurately and timely.

Having the ability to file online is a great service and time saver for the filing community. Having a system that allows online filing and provides a mechanism for filers to attest to the filing ensures the legal requirements for submitting a filing are met.

A special category of external stakeholders is the software vendor community that provides specific services to filers in the form of submitting filings to the SOS on behalf of the filers. Having a system that provides an interface for the software vendor community improves the relationships between the SOS and the software vendors and improves the ability of filers to file in a timely manner.

While transparency of data is the goal, there are a few data fields that must remain protected, such as an individual's personal address and telephone number, to name a few. A new system that can maintain the complete data submitted for PRD's internal purposes and have the ability to redact private information will bring confidence to the filing community that their personal information is secure.

A CAL-ACCESS replacement system that uses electronic workflows will improve staff efficiency and improve customer service response times. Using standardized data fields and providing submission templates will improve data validation which will lead to better data quality, and the opportunity to provide more transparency and a wider range of reporting options to PRD customers and the public. Improving PRD's ability to track filings will allow SOS to better audit the filing process, analyze submitted filings, and monitor their work quality. Improved data quality and audit / enforcement capabilities will ensure the SOS is providing the most timely and accurate data possible to the voters of California and other stakeholders.

*TIP: Copy and paste or click the + button in the lower right corner to add Business Programs, with background and context and impact descriptions as needed.*

## 1.6 Project Justification

### 1. Strategic Business Alignment

#### Enterprise Architect

Title: Information Technology Specialist III

Name: TBD – Pending a recruiting and hiring effort. This position is vacant.

Strategic Plan Last Updated? 1/21/2022

Strategic Business Goal: Goal 1 – Provide Superior Customer Service

Objective 1.1 – Standardize external communication

Objective 1.2 – Improve delivery of customer-centered services

Alignment: The CARS project will transform the campaign finance and lobbying activity filing from the current paper/FTP/online hybrid model to a fully online service model. CARS will provide a more intuitive interface, accept digital signatures as allowed by statute, and provide a mechanism to pay fees/fines online

Strategic Business Goal: Goal 2 – Stimulate Civic Engagement

Objective 2.1 – Promote Participation in the Electoral Process

Alignment: The streamlined online campaign reporting process will include help screens, guides, and templates that will assist campaign organizations (especially smaller / grass roots committees) in registering with the SOS and meeting their statutory reporting obligations. Real-time data validation with feedback to the user will reduce the re-work time and frustration for the filers, resulting in a better overall user experience.

The CARS project will include an expanded online reporting interface that will provide flexible, in-depth analysis tools for SOS staff and external stakeholders alike. The new data model is expected to allow for easier data aggregation across elections, measures, campaigns, and lobbyists; thus, providing a better picture of the relationships and sources of activity. The public and press will be able to do easy, intuitive searches of campaign and lobbying information in the new system.

Strategic Business Goal: Goal 3 – Promote Innovation and Foster a Sustainable Organization

Objective 3.1 – Embrace and continuously improve technology

Objective 3.2 – Improve business processes to achieve efficiency

Alignment: Business Process Reengineering activities will be conducted to ensure new business processes meet the requirements of the PRA and SB 1349 Hertzberg 2017.



The online campaign/lobbying reporting processes implemented by CARS will replace the manual verification processes where possible with automated data validation and filing verification (with exception reporting) based on consistent business rules stored in the system and maintained by program area staff. PRD staff will then be free to work the more complex issues raised through exception reporting and to work with filers to improve the quality and compliance of their submissions.

Program business rules will be primarily stored in and enforced by the filing application / database. This serves as a program-maintained repository for the most critical institutional knowledge, allowing continuity regardless of the staff utilizing the system. CARS will be developed using the minimum number of programming languages possible to create an effective system. The selected languages will be chosen for the applicability to SOS' IT architecture and its ability to maintain them.

*TIP: Copy and paste or click the + button in the lower right corner to add Strategic Business Goals and Alignments as needed.*

**Mandate(s):** State

Bill Number/Code, if applicable: The broad requirements for the new CAL-ACCESS Replacement System (CARS) were passed by the Legislature in SB 1349 (Hertzberg), effective January 1, 2017, and are set out by law in the Political Reform Act (PRA), Section 84602(b). SB 1239 made additional changes to the PRA to facilitate developing the new CAL-ACCESS system. (Stats. 2018, Ch. 662, and effective at certification.) Section 84602(b) outlining the requirements for CARS is available here in Appendix V-14 to the PRA. The system requirements set forth in the law and highlighted below, must be met for the SOS to certify the new system is ready for public availability and use.

Add the Bill language that includes system-relevant requirements:

**Requirement 1.** Develop a new data-driven online filing and disclosure system for state filers that meets the Legislature's intent

As stated in the law:

"To implement the Legislature's intent, as described in Section 84601, the Secretary of State, in consultation with the Commission, shall develop an online filing and disclosure system for use by persons and entities specified in Section 84605 that are required to file disclosure statements and reports with the Secretary of State's Office" under Chapters 4, 5, and 6 of the Act. §84602(b)(1).

**Requirement 2.** CARS must enable compliance with all disclosure requirements of the Act

As stated in the law:

"The system shall enable a user to comply with all the disclosure requirements of the Political Reform Act." §84602(b)(1).

**Requirement 3.** CARS must be data-driven, free, and facilitate public searches of data

As stated in the law:

The system shall include a “data-driven means or method that allows filers ... to submit required filings free of charge in a manner that facilitates public searches of the data....” §84602(b)(1)(A).

**Requirement 4.** CARS must enable a filer to comply with disclosure requirements by entering or uploading data

As stated in the law:

The system must enable “a filer to comply with all of the disclosure requirements of the title, including by entering or uploading requisite data or by indicating that the filer had no reportable activity during a particular reporting period.” §84602(b)(1)(A)(i).

**Requirement 5.** Filer access to previously submitted data for amendments and future reports

As stated in the law:

The system must retain “previously submitted data so that a filer can access that data to amend disclosures or prepare future disclosures.” §84602(b)(1)(A)(ii).

**Requirement 6.** CARS must permit filers to enter transactions once and have them appear on the appropriate reports

As stated in the law:

“The system shall permit a filer to enter a contribution or independent transaction once and have the transaction appear on both a transactional report required by Section 84203, 84204, 84204.5, 84309, or 85500, as well as a periodic campaign statement required by this title.” §84602(b)(1)(A)(ii).

**Requirement 7.** CARS must ensure data security

As stated in the law:

The system must ensure “the security of data entered and stored in the system.” §84602(b)(1)(A)(iii).

**Requirement 8.** Compatibility with local filing systems

As stated in the law:

The system, “[t]o the extent feasible, is compatible with potential future capability to accept statements from filers specified in subdivisions (b) to (e), inclusive, of Section 84215.” §84602(b)(1)(A)(iv).

**Requirement 9.** Provide system specifications matching the disclosure requirements of the PRA

As stated in the law:

The system shall include “[t]he definition of a nonproprietary standardized record format or formats using industry standards for the transmission of the data that is required of those persons and entities specified in Section 84605 and that conforms with the disclosure requirements of this title.” §84602(b)(1)(B).

The SOS shall do all of the following with respect to the online filing and disclosure system:

**Requirement 10.** CARS must accept test files

As state in the law:

“Accept test files from software vendors and others wishing to file reports electronically for the purpose of determining whether the file format is in compliance with the standardized record format developed pursuant to this subdivision and is compatible with the Secretary of State’s system for receiving the data.” §84602(b)(2)(A).

**Requirement 11.** SOS to publish list of software providers

As stated in the law:

SOS “shall publish and make available to the public a list of the software and service providers who have submitted acceptable test files. A filer shall submit acceptably formatted filers in order to meet the requirements of this chapter.” §84602(b)(2)(A).

**Requirement 12.** Public Portal:

Public search must be user-friendly, in an easily understandable format & afford greatest public access.

Must provide online searches and downloads of all data (except certain addresses and bank accounts)

As stated in the law:

“Make the data filed available on the Internet . . . in a user-friendly, easily understandable format that provides the greatest public access, including online searches and machine-readable downloads of all data contained in the system, except as specified in clause (iii).” §84602(b)(2)(B)(i).

**Requirement 13.** Public Disclosure

System must make the data filed available on the Internet

- free of charge and
- as soon as possible after receipt, or within 24 hrs. for late contribution and late independent expenditure reports.

As stated in the law:

“Make the data filed available on the Internet . . . [f]ree of charge and as soon as possible after receipt, or in the case of a late contribution, late in-kind contribution, and late independent expenditure reports, as defined by Sections 84203, 84203.3, and 84204, respectively, within 24 hours of receipt.” §84602(b)(2)(B)(ii).

**Requirement 14.** Data Privacy:

Address and bank account information shall not be made available on the Internet (except a

committee's nonresidential address).

As stated in the law:

The data made available on the internet shall not contain "the street name or building number of the persons or entity representatives listed on the electronically filed forms or any bank account number required to be disclosed pursuant to this title, except that a nonresidential address of a committee under Section 82013 may be made available on the Internet." §84602(b)(2)(B)(iii).

**Requirement 15.** Unique identifier for contributors of \$10,000 or more/Major Donors

As stated in the law:

The data shall be made available on the Internet "[i]n a manner that allows the public to track and aggregate contributions from the same contributor across filers using a permanent unique identifier assigned by the Secretary of State for this purpose. The Secretary of State shall assign this identifier to, at minimum, each contributor who makes contributions totaling ten thousand dollars (\$10,000) or more in a calendar year to, or at the behest of, candidates or committees that file electronically with the Secretary of State pursuant to subdivision (a) of Section 84215 or who files with the Secretary of State as a major donor committee under subdivision (c) of Section 82013. §84602(b)(2)(B)(iv).

**Requirement 16.** Attestations: CARS must have a procedure for filers to electronically attest to the accuracy of their filings and sign under penalty of perjury

As stated in the law:

"Develop a procedure for filers to comply electronically with the requirement to sign under penalty of perjury pursuant to Section 81004. The electronic signature procedure shall allow the filer to file with the Secretary of State and shall not require an original signature to be filed." §84602(b)(2)(C).

**Requirement 17.** Online data retention

As stated in the law:

"Maintain all filed data online for at least 20 years after the date it is filed and then archive the information in a secure format." §84602(b)(2)(D).

**Requirement 18.** Assistance to those seeking public access to information

As stated in the law:

"Provide assistance to those seeking public access to the information." §84602(b)(2)(E).

**Requirement 19.** Data security

As stated in the law:

"Implement sufficient technology to seek to prevent unauthorized alteration or manipulation of the data." §84602(b)(2)(F).

**Requirement 20.** System shall share information with the FPPC

As stated in the law:

“Provide the Commission with necessary information to enable it to assist agencies, public officials, and others in complying with and administering this title.” §84602(b)(2)(G).

Other SOS Duties/Features of CARS required by Law

**Requirement 1. Filing officer duties**

As stated in the law:

“...the filing officer shall ...

(b) Determine whether required documents have been filed and, if so, whether they conform on their face with the requirements of this title.

(c) Notify promptly all persons and known committees who have failed to file a report or statement in the form and at the time required by this title.

(d) Report apparent violations of this title to the appropriate agencies.

(e) Compile and maintain a current list of all reports and statements filed with this office.” §81010.

**Requirement 2. Late filing of statements or report; fees**

As stated in the law:

“If any person files an original statement or report after any deadline imposed by this act, he or she shall, in addition to any other penalties or remedies established by this act, be liable in the amount of ten dollars (\$10) per day after the deadline until the statement or report is filed, to the officer with whom the statement or report is required to be filed.” §91013(a).

**Requirement 3. Waivers of late fees**

As stated in the law:

“Liability need not be enforced by the filing officer if on an impartial basis he or she determines that the late filing was not willful and that enforcement of the liability will not further the purposes of the act, except that no liability shall be waived if a statement or report is not filed within . . . five days for a campaign statement required to be filed 12 days before an election, and 10 days for all other statements or reports, after the filing officer has sent specific written notice of the filing requirement. §91013(a).

**Requirement 4. Deposit late fees into state general fund**

As stated in the law:

“The officer shall deposit any funds received under this section into the general fund of the jurisdiction of which he or she is an officer.” §91013(c).

**Requirement 5. Lobbying registration fees**

As stated in the law:

“(a) The Secretary of State shall charge each lobbying firm and lobbyist employer required to file a registration statement under this chapter a fee of fifty dollars (\$50) per year for each lobbyist required to be listed on its registration statement.

(b) One half of the moneys collected pursuant to this section shall be deposited in the Political Disclosure, Accountability, Transparency, and Access Fund, and the other one-half of the moneys shall be deposited in the General Fund.” §86102.

#### **Requirement 6. Annual committee fees**

As stated in the law:

“. . . the Secretary of State shall charge each committee that is required to file a statement of organization pursuant to subdivision (a) of Section 84101 . . . a fee of fifty dollars (\$50) per year until the committee is terminated pursuant to Section 84214.” The fee is due April 30 of each year. A committee that is created and paid its fee in October, November or December of a calendar year is not subject to the annual fee for the following year. A committee that fails to timely pay a fee is subject to a penalty of three times the amount of the fee. §84101.5.

#### **Requirement 7. Calculation and display of Top 10 contributors to ballot measures**

As stated in the law:

“For a committee primarily formed to support or oppose a state ballot measure or state candidate that raises one million dollars (\$1,000,000) or more for an election, the Secretary of State shall maintain an accurate list of the committee’s top 10 contributors, as specified by Commission regulations. The list shall be based on the filer’s campaign statements and reports. A current list of the top 10 contributors shall be posted on the Secretary of State’s Internet Web site, as provided in subdivision (c).” §84223(a).

*TIP: Copy and paste or click the + button in the lower right corner to add Bill Numbers/Codes and relevant language as needed.*

## **2. Business Driver(s)**

**Financial Benefit:** Yes

Increased Revenue: No

Cost Savings: Yes

Cost Avoidance: Yes

Cost Recovery: No

Will the state incur a financial penalty or sanction if this proposal is not implemented? No

If the answer to the above question is “Yes,” please explain:

[Click or tap here to enter text.](#)

## **Improvement**

Better Services to the People of California: Yes

Efficiencies to Program Operations: **Yes**

Improved Equity, Diversity, and/or Inclusivity: **Yes**

Improved Health and/or Human Safety: **No**

Improved Information Security: **Yes**

Improved Business Continuity: **Yes**

Improved Technology Recovery: **Yes**

Technology Refresh: **Yes**

Technology End of Life: **Yes**

## 1.7 Business Outcomes Desired

### Executive Summary of the Business Problem or Opportunity:

1. Manual processes prevent adequate data validation caused by non-standardized data and free-form text fields for the approximately 67,000 paper filings per election cycle.

**Objective ID:** 1.1

**Objective:** Reduce the amount of PRD campaign and lobbying registration manual data entry by at least 50% by the end of our first election cycle after the system is made publicly available.

**Metric:** Count of filings keyed into the system over a two-year period

**Baseline:** 67,000

**Target Result:** 33,500

**Objective ID:** 1.2

**Objective:** Reduce the amount of PRD campaign and lobbying filing manual review and error correction by at least 50% by the end of the first year after the system is made publicly available.

**Metric:** Staff hours spent on manual review of campaign and lobbying disclosure reports.

**Baseline:** 29,120

**Target Result:** 14,560

**Objective ID:** 1.3

**Objective:** Increase data validation of incomplete filings and subsequent follow up by at least 50% by the end of the first year after the system is made publicly available.

**Metric:** Count of correspondence sent to address non-compliant (non-filers, referred to FPPC, incomplete statement, no signature, non-compliance, fine) within a two-year period.

**Baseline:** 17,000

**Target Result:** 8,500

2. PRD and Stakeholder business operations are at risk due to the system running on an old unsupported information technology platform which cannot be maintained or modified to be more robust or feature laden.

**Objective ID:** 2.1

**Objective:** Provide a flexible system, based on current technologies, that enables changes to filing requirements, including updated FPPC forms, as well as revised business processes in a timely manner

**Metric:** CARS should allow for minor to moderate system changes via PRD-user level configuration or moderate complexity change requests that can be accomplished within time periods not to exceed six months.

**Baseline:** Launch a system that complies with all current requirements and business practices

**Target Result:** The system is designed to allow for PRD-user level configuration for foreseeable changes as well as for simple modification via change requests.

3. PRD and Stakeholders have limited online information access, audit, and report filing capabilities which hinders timely and accurate online reporting, audit efficiency and report generation.

**Objective ID:** 3.1

**Objective:** Increase FTB audit efficiencies by providing data integrity and enhanced search capability by reducing the amount of time allocated to manual intervention and validation by 40%.

**Metric:** The FTB conducted 163 audits with a budget of 2.035 million in FY 2018/19.

**Baseline:** 163 audits with a budget of 2.035 million budget

**Target Result:** Increase of up to 25 audits

**Objective ID:** 3.2

**Objective:** Allow members of the public (including the media) to easily retrieve filings without PRD intervention and to query data sets to obtain custom information without PRD intervention.

**Metric:** CARS must provide a database that contains all campaign and lobbying data, including history, and an integrated reporting toolset that has inquiry access to all data.

**Baseline:** Qualitative



**Target Result:** Y/N - Database that contains all campaign and lobbying data, including history, and an integrated reporting toolset that has inquiry access to all data

**Objective ID:** 3.3

**Objective:** Provide an application programming interface (API) for submission of filings.

**Metric:** Successful receipt of API filings submission

**Baseline:** 0 record API submission

**Target Result:** Y/N – Successful transmission of all API submission filings via new system

4. PRD staff engage in compliance activities including identifying missing filings and assessing fines for late filings.

**Objective ID:** 4.1

**Objective:** Reduce by 25% the amount of time staff spends identifying and tracking delinquent filings, assessing, and collecting fines, and processing waiver requests, in order to increase capacity in these areas.

**Metric:** Staff time spent for assessing fines, collecting fines, and processing waivers based on current benchmarks.

**Baseline:** 14,560 Hours / Yr.

**Target Result:** 10,920 Hours / Yr.

5. Filers can be confused by the complex filing deadlines and requirements; some fail to file required reports or file late.

**Objective ID:** 5.1

**Objective:** Automate PRD's non-filer notification process to reduce late and missed filings. The system shall remind filers of upcoming filing deadlines and automatically notify them about missed filings of periodic reports (semi-annual and pre-election filings).

**Metric:** Count of non-filer correspondence generated over a typical four-year election cycle.

**Baseline:** 17,000

**Target Result:** 8,368

6. The new system must comply with industry security standards and legislation that governs the Political Reform Act (PRA).

**Objective ID:** 6.1

**Objective:** Provide the ability for secure online submission.

**Metric:** Successful secure online submission

**Baseline:** 0 record secure submission

**Target Result:** Y/N – Secure receipt of online transmission

**Objective ID:** 6.2

**Objective:** Provide the ability for data information redaction.

**Metric:** Successful data information redaction

**Baseline:** 0 data record redaction

**Target Result:** Y/N – Successful data information redaction

**Objective ID:** 6.3

**Objective:** Provide the ability for digital signature submission.

**Metric:** Successful digital signature submission

**Baseline:** 0 record digital signature submission

**Target Result:** Y/N – Successful receipt of digital signature submission

**Objective ID:** 6.4

**Objective:** Provide secure data storage and archiving in a manner consistent with PRA retention guideline.

**Metric:** Successful secure data storage and archiving

**Baseline:** 0 record secure data storage and archiving

**Target Result:** Y/N – Successful data storage and archiving

*TIP: Copy and paste or click the + button in the lower right corner to add Objectives as needed. Please number for reference.*

*TIP: Objectives should identify WHAT needs to be achieved or solved. Each objective should identify HOW the problem statement can be solved and must have a target result that is specific, measurable, attainable, realistic, and time-bound. Objective must cover the specific. Metric and Baseline must detail how the objective is measurable. Target Result needs to support the attainable, realistic, and time-bound requirements.*

## 1.8 Project Management

### 1. Project Management Risk Score: 2.3

(Attach a completed [Statewide Information Management Manual \(SIMM\) Section 45 Appendix A Project Management Risk Assessment Template](#) to the email submission.)

### 2. Project Approval Lifecycle Completion and Project Execution Capacity Assessment

Does the proposal development or project execution anticipate sharing resources (state staff, vendors, consultants, or financial) with other priorities within the Agency/state entity (projects, PALs, or programmatic/technology workload)?

**Answer:** Yes

Does the Agency/state entity anticipate this proposal will result in the creation of new business processes or changes to existing business processes?

**Answer** (No, New, Existing, or Both): Both New and Existing Processes

## 1.9 Initial Complexity Assessment

### 1. Business Complexity Score: 3.0

(Attach a completed [SIMM Section 45 Appendix C](#) to the email submission.)

### 2. Noncompliance Issues: (Indicate if your current operations include noncompliance issues and provide a narrative explaining how the business process is noncompliant.)

Programmatic regulations: Yes

HIPAA/CIIS/FTI/PII/PCI: No

Security: Yes

ADA: Yes

Other: Yes

Not Applicable: No

Noncompliance Description:

Current system does not allow filers to comply with all current filing regulations. There is no sensitive PII or health data in the current system, though the new system may include limited health information provided by a filer explaining why they filed late, as part of the waivers process. PDF displays in the current system for electronic filings are not ADA compliant. Some data submitted by third party filers does not populate correctly in the system.

### 3. Additional Assessment Criteria

If there is an existing Privacy Threshold Assessment/Privacy Information Assessment, include it as an attachment to your email submission.

How many locations and total users is the project anticipated to affect?

Number of locations: [One and anyone on the internet](#)

Estimated Number of Transactions/Business Events (per cycle): [1,000,000 transaction per year.](#)

Approximate number of internal end-users: [35](#)

Approximate number of external end-users: [Possibly 10% of the population of the State of California.](#)

## 1.10 Funding

### Planning

1. Does the Agency/state entity anticipate requesting additional resources through a budget action to **complete planning** through the project approval lifecycle framework? [Yes](#)

If Yes, when will a budget action be submitted to your Agency/DOF for planning dollars?

[5/17/2022](#)

2. Please provide the Funding Source(s) and dates funds for planning will be made available:

The project will be funded with \$11,300,000 for project planning activities. \$10,800,000 from General Funds and \$500,000 from the Political Disclosure, Accountability, Transparency, and Access Fund (PDATA). Of the funding requested, \$8.03M will be made available to the project until the S1BA is approved by CDT and reported to the Joint Legislative Budget Committee. The project will use \$8.03M to acquire limited term, permanent and contracted staffing resources to conduct project planning activities, CDT advisory and oversight services, and technology needed during the project planning phase. The remaining \$3.24M will be used to acquire additional limited term and permanent full-time staffing resources and the technology needed for data readiness activities.

### Project Implementation Funding

1. Has the funding source(s) been identified for **project implementation**? [No](#)

If known, please provide the Funding Source(s) and dates funds for implementation will be made available:

[Click or tap here to enter text.](#)

Will a budget action be submitted to your Agency/DOF? [Yes](#)

If "Yes" is selected, specify when this BCP will be submitted: For FY 2023/2024

2. Please provide a rough order of magnitude (ROM) estimate as to the total cost of the project: [Between \\$10 Million and \\$50 Million](#)— this the range of choice offered in the template options. If

we can specify a more specific number, \$55M is an estimate that equals the \$11.3M funded for FY 22-23 plus the ROM estimates provided in the Independent Assessment reports from now through FY 25-26.

**End of agency/state entity document.**

**Please ensure ADA compliance before submitting this document to CDT.**

**When ready, submit Stage 1 and all attachments in an email to [ProjectOversight@state.ca.gov](mailto:ProjectOversight@state.ca.gov).**

## Department of Technology Use Only

Original "New Submission" Date: [7/21/2022](#)

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Form Status Date: [7/25/2022](#)

Form Disposition: [Approved](#)

If Other, specify: [Click or tap here to enter text.](#)

Form Disposition Date: [7/25/2022](#)

Department of Technology Project Number (0000-000): [0890-054](#)