



OKLAHOMA
Ethics Commission

Oklahoma Ethics Commission

FY 2026 Budget Hearing Presentation

Submitted by: Lee Anne Bruce Boone, Executive Director



The **Oklahoma Ethics Commission**, created in Article 29 of Oklahoma's Constitution, has the following constitutional responsibilities:

- Enact Ethics Laws for Campaigns for State Office, State Employees/Officers, State Initiative & Referenda;
- Investigate and prosecute violations of Ethics Rules; and
- Interpret Ethics Rules thru Binding Advisory Opinions, as necessary.

Founded in 1990, this agency now encompasses the following divisions: Administrative Operations; Information Services; and Political Subdivision Enforcement. The Ethics Commission also oversees limited regulatory authority for political subdivision campaigns and financial disclosures, including counties, certain municipalities, and independent school and technology center districts.

Lee Anne Bruce Boone
Executive Director

Agency Vision, Mission and Core Values

Vision: The Commission endeavors to increase the trust of citizens in their government by enacting and enforcing Rules that avoid conflicts between state officers and employees public duties and private economic interests, as well as ensuring fair and transparent campaigns for an informed citizenry.

Mission: The Oklahoma Ethics Commission is required to enact Ethics Rules of conduct for state officers, state employees, campaigns for elective state office, and campaigns for initiatives and referenda, including civil penalties for violations of the Rules. The Commission may also offer binding interpretations of its Rules. The Commission is required to investigate alleged violations of its Rules which it may prosecute in District Court or settle. The Commission has limited jurisdiction over conduct of campaigns and financial disclosure at the political subdivision level.

Core Values: The Commission strives to be a service-oriented Commission through responsive communications and providing transparency in state campaigns and state government to the regulated community, media, and citizens by providing fair Rules, immediate access to reports filed with the Commission, tailoring enforcement to the situations presented, interpreting Rules as necessary, and providing opportunities for education on the Ethics Rules as resources allow.



Accomplishments

Top accomplishments for FY 2024 – FY 2025

- 1) Secured Contract for Guardian System Replacement with opportunity to own source code and operate independently in the future.
- 2) Created Education Programming, offering 10+ educational opportunities in last quarter.
- 3) Implemented Model Diversionary Program to offer opportunity to seek education with a reduced fine.
- 4) Expanded Compliance and Leadership Team to return emphasis to proactive approach of education for regulated community.
- 5) Cleanup of Backlog of complaints and investigations (dating back to 2020) and resolution of lobbyist fee collection for the overpayment of 2024 lobbyist/legislative liaison registration fees.



Analysis of Agency Challenges

	Challenge	Current Actions (Briefly describe how the agency is currently addressing the challenge.)	Planned Actions (Briefly describe how the agency plans to address the challenge going forward.)
1	New Online Reporting System	Moving to a new online reporting system for required campaign finance reporting and state employee/elected official conflict of interest reporting	RFP issued Summer 2024 with Contract Executed in Dec 2024; Implementation of new system in 2025.
2	Political Subdivisions Management/Enforcement	Hard copy reporting spanning 77 Counties, 45 municipalities (10,000+ citizens), 509 Public School Districts; and 29 Technology Centers. Evaluation and Education for Political Subdivisions.	Staggered implementation to integrate campaign finance reporting into new Online Reporting System. Regional training seminars and webinars for local outreach.
3			
4			



Savings & Efficiencies (Current or Planned)

Savings or Efficiency Name	Brief description of how savings were achieved	Savings in Unit of Measurement	FY 2024 (Actual \$ Savings)	FY 2025 (Projected \$ Savings)	FY 2026 (Projected \$ Savings)
<i>Professional Services</i>	<i>Reduced anticipated cost of legal fees/ services with in-house Counsel and partnership with AG's office</i>	<i>Saved approximately 50% of annual budgeted amount</i>	<i>\$48,000</i>	<i>N/A (reduction in budget)</i>	

** Hours, FTE, square feet, etc.*



Agency Goals and Key Performance Metrics

Goal		Metric	FY 24 Target*	FY 24 Actuals	FY 25 Target	FY 29 Target
1	Candidate Committee Compliance Reviews	# Reviewed Quarterly for quarterly reporting % Reviewed by Election: Election Specific	80%	65.26%	Remove as KPM	Remove as KPM
2	Lobbying Expenditure Report Compliance Review	Within 1 week of deadline	100%	100%	Remove as KPM	Remove as KPM
3	Campaign Finance: Non-Candidate Committee & Non-Oklahoma Committee Compliance Reviews	# Reviewed Quarterly for quarterly reporting % Reviewed by Election: Election Specific	15%	0%	Remove as KPM	Remove as KPM
4	Regular Reporting Administrative Enforcement Campaign C&E Reports Finance & Lobbying Expenditure Late Filed Reports	% Action within 8-10 days following deadline	100%	100%	Remove as KPM	Remove as KPM
5	Registrations	% Review & Act w/n 5 days	100%	100%	Remove as KPM	Remove as KPM
6	Complaints & Investigations	90 days>: Prelim Inv & 1st Action by Commission	60%	31%* (*Backlog of complaints discovered in 2024)	Remove as KPM	Remove as KPM
7	Journals	Daily: Business Day Updates	100%	100%	Remove as KPM	Remove as KPM
8	(Working with OMES to include new Metrics)					



Projects for FY 2025

- 1) Implement new reporting software system for campaign finance, lobbyists, PACs, and committees, to include local political subdivisions and schools/tech centers. To succeed, must secure the remainder of funding needed from legislature and ensure key deliverables are met as described in the contract. Revolving funds of \$1.2M already set aside for this purpose.
- 2) Create Comprehensive Educational Program for Officeholders, Candidates, State Officers and Employees. Staff will prioritize, assess and monitor educational needs of those we serve, accounting for administrative and compliance issues found in staff reviews. Evaluation of educational offerings will be sent via survey with targets for outcomes and for reduced compliance issues. Utilizing current staff and operating budget for this project, to include virtual/online content as well as in-person learning seminars.
- 3) Develop Strategy and Inclusion of Political Subdivisions for Enforcement and Education beginning Fall 2025. OEC will prioritize, assess and support key regional and local contacts for staggered implementation plan. 100% inclusion over 1-3 year staggered period with compliance reporting percentages to improve annually.



Projects for FY 2026

- 1) Establish full scale Diversion Program after pilot program's conclusion. Will reduce compliance fees/fines and create proactive approach to compliance. First-time offenders and other broad categories will be prioritized, and ability to utilize new software reporting system for automated notification (rather than offline creation of program) will assist in full-scale implementation. Maintain records of completion for diversion program and establish data points to determine effectiveness.
- 2) Create advisory group for OEC for strategic advice, routine feedback and recommendations to Commission. Seek volunteers to include candidates, officeholders, state officers and/or state employees willing to serve as part of 2-year term for quarterly meetings to address concerns and needs of OEC. Result of improved satisfaction and effectiveness of OEC.



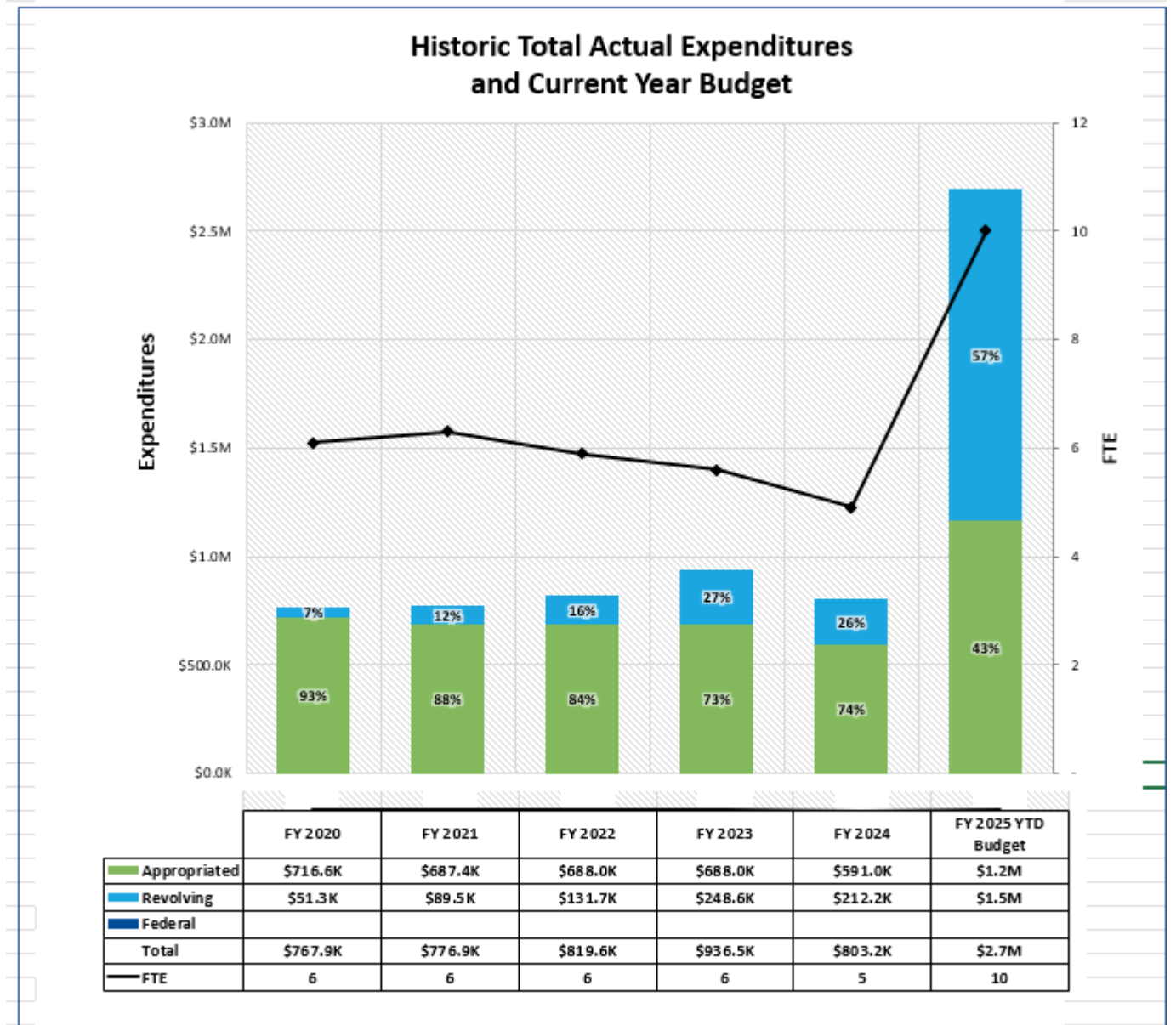
Total Historic Actual Expenditures (FY 2020-24) and Current Year Budget (FY 2025)

Explanation of Changes and Trends

Funds appropriated in the amount of \$150,000 for Political Subdivision Enforcement

Funds appropriated by legislature to restore Commissions to previous FY16 and for compliance staffing for education.

Funds appropriated for new software for end-of life Guardian system.



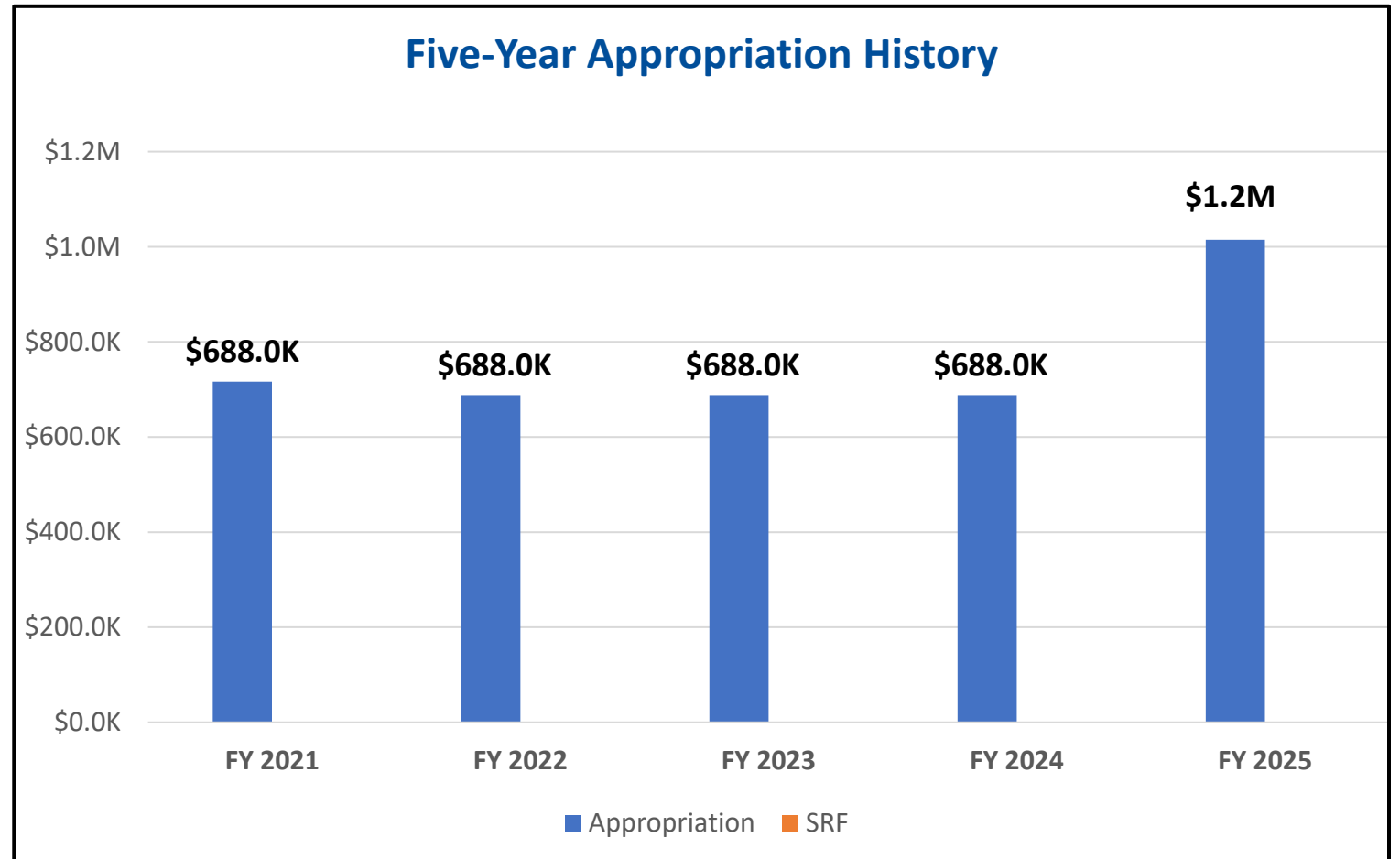


FY 2025 Budgeted Full Time Equivalents (FTE)

	FY 2025 Budgeted FTE
Total FTE	10
Supervisor FTE	3
Supervisors to Total FTE Ratio (%)	30%
Current Budgeted but Unfilled FTE	0

Appropriation History

Fiscal Year	Legislated Appropriation (\$) <i>(Includes supplementals and SRF/ARPA if applicable.)</i>
FY 2021	\$687,957
FY 2022	\$687,957
FY 2023	\$687,957
FY 2024	\$687,957
FY 2025	\$1,164,630



Financial Resource Analysis

Carryover	FY 2021	FY 2022	FY 2023	FY 2024
Total appropriated carryover amount expended (\$)	N/A	N/A	N/A	N/A

Historical Cash Balances	FY 2021	FY 2022	FY 2023	FY 2024
Year End Revolving Fund Cash Balances <i>(All Revolving Funds)</i>	\$585,458.04	\$585,458.04	\$608,318.04	\$

Revolving Class Fund # <i>(Unrestricted only)</i>	Revolving Class Fund Name <i>(Unrestricted only)</i>	Current cash balance (\$)	Projected FY 2025 year-end cash balance (\$)
200	Ethics Commission Revolving Fund	\$591,842	\$618,604
211	Ethics Comm Online Filing Revolving Fund	\$195,347	\$163,807
		\$	\$
#		\$	\$
#		\$	\$
#		\$	\$
	Total Unrestricted Revolving Fund Cash balance:	\$	\$



Unrestricted funds are those that are not limited by state or federal law, rule, regulation, other legally binding method, or donor restriction.

FY 2023 – 2024 Appropriation Change Review

<i>Purpose of appropriation increase or decrease</i>	<i>Amount FY 2023</i>	<i>Amount FY 2024</i>	<i>Total amount received FY 2023 - 24</i>	<i>Total amount expended by 11/1/2024</i>	<i>Included in FY 2025 approp? (Yes/No)</i>	<i>If not expended fully, please explain.</i>
N/A	\$	\$	\$	\$		
	\$	\$	\$	\$		
	\$	\$	\$	\$		
	\$	\$	\$	\$		
	\$	\$	\$	\$		
	\$	\$	\$	\$		
	\$	\$	\$	\$		
	\$	\$	\$	\$		
	\$	\$	\$	\$		
Totals	\$	\$	\$	\$		



**Do not include SRF / ARPA appropriation increases.*

Budget & Supplemental Incremental Request Summary

Request Name		FY 2026 Incremental Appropriation Request Amount (\$) {or FY 2025 for Supplementals}	Type of Request: Recurring, One-time, or Supplemental
1	Full Implementation of Software Solution	\$1,000,000	One-time
2	Political Subdivision Enforcement Funding	\$300,000	Recurring
3			
4			
5			



(1) Incremental Budget Request

Name of Request Full Implementation of Software System	
Type: One-Time	\$ Incremental Amount Requested for FY 2026: \$1,000,000
<p>These funds are needed to finish implementation of software system as replacement of The Guardian System. This will ensure the complete buildout and include replacing outdated software applications to improve functionality, user experience, and security. Current software system end of life June 30, 2025. This includes remainder of implementation costs, project management, licensing fees, and possible incentives for early completion of deliverables.</p>	



(2) Incremental Budget Request

Name of Request: Political Subdivision Enforcement Funding

Type: Recurring

\$ Incremental Amount Requested for FY 2026 \$300,000
(\$150,000 one-time funding currently)

These funds are needed to ensure continuity of funding to support key regional and local contacts for staggered implementation plan. 100% inclusion with automated compliance reporting availability upon staggered phase-in.



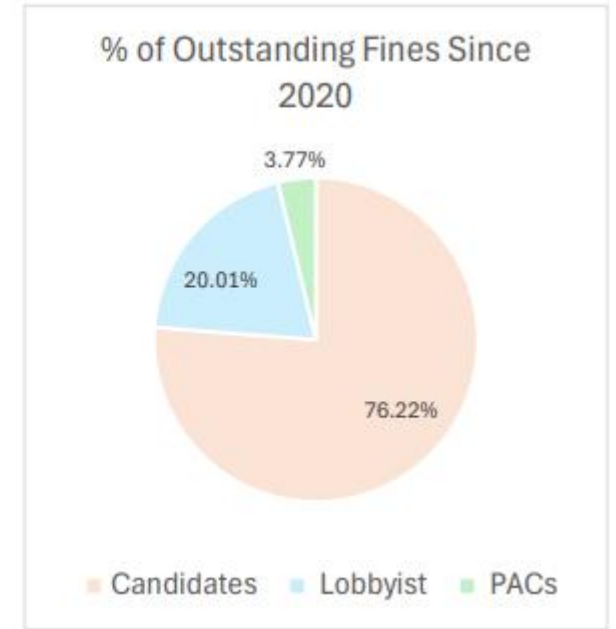
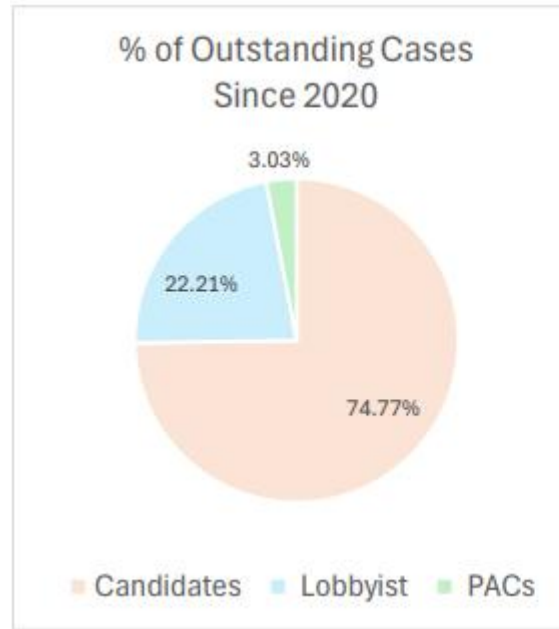
Accomplishments

- **Improved Visibility and Online Presence:** Updated the Ethics Commission website by moving to the state's new identified platform with adjusted graphic standards including an updated logo. Re-engagement on social media platforms Facebook and X.



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Commission Backlog



- During 2024, Commission staff brought nearly 40 Complaints before the Commission. Some of these dated back to 2020, of which the Commission had not been previously informed.
- Moving forward, our goal is to have any complaint received prior on that month's agenda (excluding complaints received within one week of the commission meeting).
- A total of 59 administrative cases still needed to be heard before an Administrative Law Judge. These cases represented \$36,750.00 in unpaid fees. 57% were from before 2023.
- A total of 243 administrative cases had been issued a Final Order, representing \$138,775 worth of penalties and assessments. Some of these Final Orders were more than 4 years old.
- We proposed to set for hearing all cases with a Proposed Compliance Order dated no earlier than January 1, 2022, to present. With the Commission's approval and due to the previous administration's decision to suspend hearings, we dismissed administrative actions throughout 2021. This resulted in ensuring equal treatment for all those who were not compliant after calendar year 2021.