Louisiana Board of Ethics

Campaign Finance and Disclosure Systems Best Practices

Submitted pursuant to Act No. 664 of the 2024 Regular Legislative Session

January 10, 2025

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Introduction

This study was created in response to Act No. 664 (the Act) of the 2024 Regular Session. The Act directed the Louisiana Board of Ethics (the Board) to "conduct an investigation and analysis of best practices that are currently in place in other states that could be implemented to modernize Louisiana's campaign finance and disclosure system." It further specified that the results of the study must be presented no later than January 31, 2025.

Study Requirements

The Act specifically mentioned several areas of study for the Board to review. These areas are listed below with text directly from Act No. 664.

- an investigation and analysis of best practices currently in place in other states that could be implemented to modernize Louisiana's campaign finance and disclosure system, including a review of technological systems that could be implemented in Louisiana
- an analysis of the potential costs and benefits of updating Louisiana's campaign reporting technology, including a study of the feasibility of implementing a system which allows for
    - simplified electronic filing of any and all campaign finance-related disclosure reports using a single login for each user that is capable of accessing data and filing reports for multiple campaigns and committees,
    - deadline tracking,
    - real-time calculations of total expenditures and debts,
    - simplified digital templates,
    - integration of application programming interface ("API") technology at all levels of campaign filing, and
    - automatically generated data models and maps like those that are currently in use in the State of Washington, as implemented by the Washington State Public Disclosure Commission

Study Approach

Board staff has taken a multipronged approach to performing this study. In order to determine and analyze the best practices that are currently in place in other states, Board staff found a study that enumerated some best practices for campaign finance and disclosure reporting and visited the websites for all fifty states to determine whether and how well those practices are utilized. Staff additionally created a self-study survey for state agencies regarding reporting systems, their associated costs, and features supported. This study was sent electronically to agencies in all fifty states. As a self-study of Louisiana's current electronic filing system, staff created a survey for current users of the system which included the ability to give suggestions on how to improve the system. After all this data was compiled and analyzed, Board staff revisited each of the requested items listed in the Act and estimated the cost and time to implement each in Louisiana.

History of Electronic Filing Campaign Finance and Disclosure Reports in Louisiana

Before focusing on the direction that Louisiana can go with electronic filing of campaign finance and disclosure reports, it is important to look at how the e-filing process has evolved over the years.

In 1996, the Legislature enacted R.S. 42:1158 that required the Board to establish the Board of Ethics Computerized Data Management System, which included the ability to permit the electronic filing of all reports required to be filed with the Board by May 1, 1998. The Board was appropriated approximately $240,000 to develop its system, which included the electronic filing system, which was called LEADERS (Louisiana Ethics Administration Disclosure and Electronic Reporting System).

Initially, LEADERS was developed as a desktop software application and focused on compatibility with the most used operating systems at the time, which did not accommodate non-Windows operating systems such as MacOS or Linux. LEADERS required filers to download the software, as well as any subsequent updates to the filing system, on-premises.

In 2000, the House of Representatives enacted HCR 26, which urged and requested that the Board of Ethics study the development of a browser-based e-filing system or to broaden LEADERS capability to be compatible with non-Windows operating systems. The report to the House and Governmental Affairs committee included estimated costs of $150,000 to $200,000 to modify the system to accept filings from MacOS or Linux users and over $400,000 to develop a browser-based system.

In the spring of 2005, RFPs were sought from vendors to make necessary changes to the LEADERS System to allow filers to use platforms other than Windows to file reports, as well as necessary changes to make the software more user-friendly for filers and to facilitate the future migration to a web-based filing system. A contract was awarded, and LEADERS 3.0 was developed at a cost of $250,000 The new version of LEADERS allowed filers to use operating systems other than Windows to electronically file reports; however, it was still desktop application that necessitated the program and any updates to be downloaded by users.

Subsequent appropriations of less than $150,000 between 2011 and 2016 allowed the agency to release a web-based version of LEADERS in January of 2015. Currently, campaign finance filers must either use the web-based version of LEADERS or programs created by third-party vendors that are compatible with LEADERS Vendor specifications in order to e-file their reports with the Board. Switching to a web-based system had multiple advantages, such as 1) allowing staff of the Board of Ethics to make minor updates if statutes are enacted that necessitate changes to the reporting requirements, 2) alleviating the need for users to download software and updates to the software, 3) eliminating filers' concerns about saving their data, and 4) making it easier for staff to assist users with filing reports.

Analysis of Best Practices Regarding Public Access to Filed Information Currently in Place in Other States

This portion of the study focuses on best practices with regard to how the public interacts with the filed Campaign Finance and Disclosure reports. This is referenced in the Act when it specifies "automatically generated data models and maps" as well as the "integration of application programming interface technology." In 2015, a study was published by Follow the Money (Burgam, 2015) detailing best practices as it relates to the relevant information required by campaign finance reporting and how to present and make that data available to the public. In order to consider how other states implement these best practices, Board staff evaluated website access to campaign finance and disclosure reports filed with all fifty states and requested that the agencies from those states respond to a survey regarding their state's Campaign Finance and Disclosures laws and practices.

Automatically generated data models refer to graphs, tables, and maps created "on the fly" based on up-to-date electronically filed campaign finance data. These types of charts can allow the public to see which elections are attracting the most funding and how that funding is being used. The types of data models that can be made available are heavily dependent on the type of information that is collected. From our survey, we found sixteen of fifty states currently display aggregate data in such a manner. This study will reference the automatically generated data models that are produced by several of these states.

Campaign Finance Reporting Best Practices

Campaign Finance Reports refer to reports that contain contribution and expenditure information from candidates, committees, or other persons pertaining to particular election cycles. For the purposes of this study, we excluded non-financial reports that are filed with the Campaign Finance Division, such as Statements of Organization, Statements of Dissolution, Designations of Principal/Subsidiary Campaign Committees, and Certifications of Required Ethics Training.

The report from Follow the Money (Burgam, 2015) identifies three basic areas to consider for best practices with regard to publicly accessible Campaign Finance Reports: Data Completeness, Timeliness of Filings, and Accessibility of the Data. This analysis will examine each of these areas to see how other states implement these best practices and what it would take for Louisiana to do the same.

Data Completeness

When referring to data completeness, the study published by Follow the Money (Burgam, 2015) mentions several areas of interest based on the type of information required to be reported for each contributor and each transaction. The purpose of requiring certain types of information is to help the public discern how campaigns are being funded and how that funding is being used. Requiring the information to be filed in certain ways allows for that information to be displayed in a graphical format that can help the public to see the overview of different campaigns at a glance.

Information Required to be Reported for Each Contributor

The Follow the Money Study (Burgam, 2015) asserts that best practices are for filers to disclose the contributor's name, occupation/employer, complete address, and type of contributor. In addition, the best practice is to list the contributor's total amount contributed to the campaign.

While all states require contributions to be reported, different states have different thresholds of when those contributions must be attributed to specific contributors and what specific information needs to be reported. When a contributor must be reported, all states require the name and address to be listed. Twenty-seven states require the aggregate contribution amount from that contributor to be listed.

Twenty-six states require employment information for contributors, and twenty-nine states require occupation to be listed. Although for both, most seem to limit that requirement to those who have given over a particular threshold. Eleven states use categories or different schedules for the filers to specify the type of contributor, such as individual, non-profit, political committee, business, etc. This allows those states to display aggregate data showing the amount of money contributed by different types of contributors as Maine and Washington do in Figure 1 and Figure 3.

Figure 1 - Example of Aggregate Data from Maine - Total Contributions in 2024 (Maine Ethics Commission, 2024)

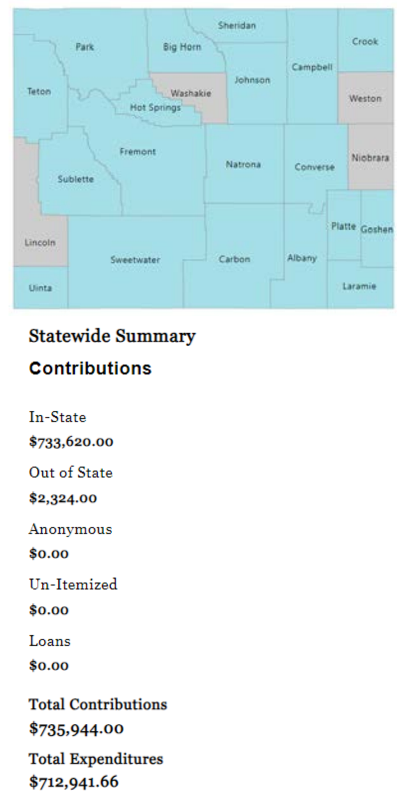

Figure 2 - Example of Aggregate Data by Filer Profile from Wyoming - Heat Map and Summary of Contributions for Charles Jan Gray (Wyoming Secretary of State, 2024)

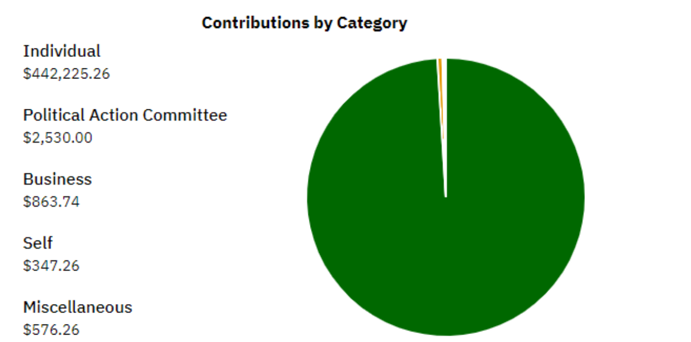

Figure 3 - Example of Aggregate Data by Filer Profile from the State of Washington – Contributions by Category for Ann Davison (Washington Public Disclosure Commission, 2024)

Louisiana currently requires that when a campaign filer reports a contribution, in addition to the date and the amount of the contribution, the filer must report each contributor's name, complete address, and the aggregate amount contributed for the election cycle. Additionally, for candidate reports, the filer must specify if the contributor is a Political Committee or a Party Committee or if the contribution is from the candidate. With the information that is currently submitted on e-filed Campaign Finance Reports, the Board could potentially display graphs for total contributions received per calendar year or heat maps by zip code for contributions (similar to graphs displayed by Wyoming in Figure 2). Board staff is currently in the process of researching the types of graphs that might be useful to the public and could be achieved with the data that is currently submitted via e-filed Campaign Finance Reports. Adding these additional features to the Campaign Finance Search is currently on the Board's long term goals list.

Louisiana law does not currently require occupation or employment information to be reported for individual contributors and, outside of specifying if a contributor is a Political Committee or Party

Committee or the candidate, does not require a more specific contributor type (such as Individual, Business, Non-profit, etc.). Any updates to these requirements would require Legislative action.

Information Required to Be Reported for Each Transaction

Best practices stipulate that the date on which each transaction occurred should be reported and that different transactions should be classified by clearly identified types. With certain exceptions (namely raffle ticket or campaign paraphernalia sales of $25 or less), Louisiana already requires campaign finance filers to specify the date for each transaction.

Since the prior section discussed classifications of contributions, this section will focus on information for expenditures. Similar to thirty other states, Louisiana currently requires all filers to give a description for each expenditure. Nineteen states require some reporting of expenditures within specified categories. Seventeen states require filers to categorize each expenditure, while two additional states ask filers to give an overall summary of their expenditures within specific categories. Figure 4 and Figure 5 give examples of the types of categories used by other states.

CODES FOR CLASSIFYING EXPENDITURES: If one of the following codes is used to describe an expenditure, no other description is generally needed. The exceptions are:

1) If expenditures are in-kind or earmarked contributions to a candidate or committee or independent expenditures that benefit a candidate or committee, identify the candidate or committee in the Description block;
2) When reporting payments to vendors for travel expenses, identify the traveler and travel purpose in the Description block; and
3) If expenditures are made directly or indirectly to compensate a person or entity for soliciting signatures on a statewide initiative or referendum petition, use code "V" and provide the following information on an attached sheet: name and address of each person/entity compensated, amount paid each during the reporting period, and cumulative total paid all persons to date to gather signatures.

CODE DEFINITIONS ON NEXT PAGE

C - Contributions (monetary, in-kind & transfers)
I - Independent Expenditures
L - Literature, Brochures, Printing
B - Broadcast Advertising (Radio, TV)
N - Newspaper and Periodical Advertising
O - Other Advertising (yard signs, buttons, etc.)
V - Voter Signature Gathering

P - Postage, Mailing Permits
S - Surveys and Polls
F - Fundraising Event Expenses
T - Travel, Accommodations, Meals
M - Management/Consulting Services
W - Wages, Salaries, Benefits
G - General Operation and Overhead

Figure 4 - Example of Expenditure Categories from Washington (Washington Public Disclosure Commission, 2024)

EXPENDITURE CATEGORIES FOR BOX 8(a)

Advertising Expense
Accounting/Banking
Consulting Expense
Contributions/Donations Made By Candidate/Officeholder/Political Committee
Credit Card Payment

Event Expense
Fees
Food/Beverage Expense
Gift/Awards/Memorials Expense
Legal Services

Loan Repayment/Reimbursement
Office Overhead/Rental Expense
Polling Expense
Printing Expense
Salaries/Wages/Contract Labor

Solicitation/Fundraising Expense
Transportation Equipment & Related Expense
Travel In District
Travel Out Of District
Other (enter a category not listed above)

The Instruction Guide explains how to complete this form.

Figure 5 – Example of Expenditure Categories from Texas (Texas Ethics Commission, 2024)

Categorizing data in this manner allows the information to be summarized in graphical format so that the public can easily see how campaign funds are being spent. Figure 7 illustrates how the State of Washington uses categorization to show how individual candidates use their funds. Also, from Washington's website, Figure 6 uses a bar graph to show by office which elections expended the most funds.

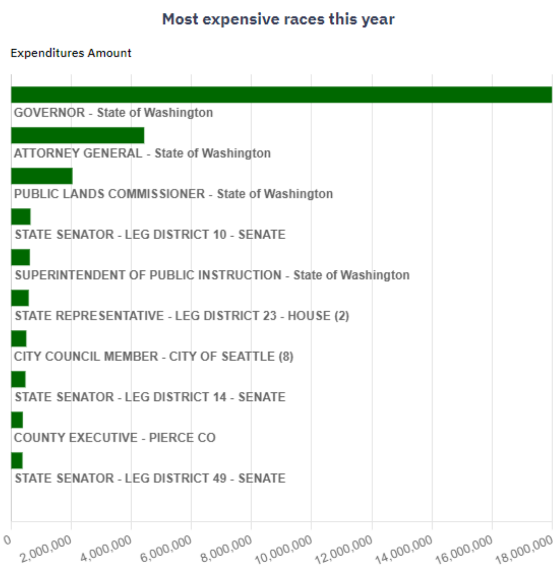

Figure 6 - Example of Aggregate Data from the State of Washington - Most Expensive Races this Year (Washington Public Disclosure Commission, 2024)

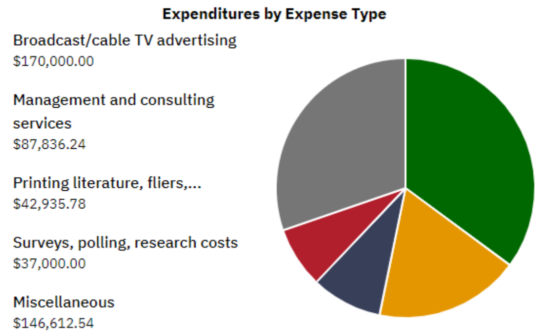

Figure 7 - Example of Expenditure Type Graph from the State of Washington Displaying Expenditures by Category for Ann Davison (Washington Public Disclosure Commission, 2024)

With the information that is currently required for expenditures, Board staff could potentially create automatically generated graphs to show total expenditures per election cycle or per office. As with the contributions focused graphs, Board staff is currently in the process of researching the types of graphs that might be useful to the public and that could be achieved with the data that is currently submitted via e-filed Campaign Finance Reports. Adding these additional features to the Campaign Finance Search is currently on the Board's long term goals list.

If the campaign finance reporting forms were updated to ask filers to specify categories of expenditures, then the Board could also display graphs illustrating how campaign finance funds are utilized. Adding categories to the forms would require Legislative action.

Summarizing Data Completeness Best Practices

As stated earlier, the purpose behind following best practices for data completeness is to ensure that the information collected in Campaign Finance Reports is useful to the public in determining how campaigns are funded and how those funds are expended during the election cycle.

Table 1 is used to summarize Louisiana's current compliance with the best practices outlined in the Follow the Money report (Burgam, 2015). It shows that Louisiana is fully compliant with the majority of the best practices for data completeness, but that there is always room for improvement, particularly in how contributors and expenditures are categorized. Any of these improvements would require legislative updates to the Campaign Finance Disclosure Act to allow the Board to update the forms and e-filing systems to gather new information.

Table 1 - Summary of Data Completeness Best Practices

Best Practices for Data Completeness (Burgam, 2015)	**Louisiana's Compliance Level**	**Summary**
Require disclosure of contributor's name and complete address	Fully Compliant	Louisiana requires filers to disclosure contributor's names and full addresses, with the exception of campaign paraphernalia and raffle ticket sales under $25.[1]
Require disclosure of contributor's occupation and employer	Not Compliant	Louisiana does not currently require filers to specify contributors' occupation or employer. Thirty-two states require contributor's occupation and/or employer to be listed, although some only require such information for those that contribute over a certain amount.
Identify the type of contributor	Partially Compliant	Candidates are required to specify total amount of self-funded contributions as well as to identify contributions from Political Committees.[2] Filers are not required to further specify the types of contributors (such as, Individual, Business, Non- Profit, Immediate Family, Lobbyists, etc.). Eleven states use either categories or separate filing schedules to distinguish between different types of contributors.
Differentiate and clearly identify transaction types: Identify the type of contribution	Fully Compliant	Louisiana distinguishes between types of contributions using different filing schedules for monetary, in-kind, loans, and loan repayments.[2]
Differentiate and clearly identify transaction types: Identify the type of expenditure	Partially Compliant	Louisiana requires filers to provide a description for each expenditure;[3] however, this could be improved if Louisiana also required filers to specify the category for each expenditure as well. Nineteen states require expenditures to be categorized by type.
List contributors' aggregate contributions	Fully Compliant	Louisiana already requires that Candidates and Political Committees report aggregates for contributors.[4]
Provide the date on which each transaction occurred	Fully Compliant	Louisiana requires filers to disclosure contributor's names and full addresses, with the exception of campaign paraphernalia and raffle ticket sales under $25.

Timeliness of Filings

With regard to the best practices for timeliness of filings, the report from Follow the Money (Burgam, 2015) specifies that filers should report large contributions and contributions received in the run up to the election date in a prompt manner, even if those contributions would also appear on a later standard campaign finance report. By statute, Louisiana currently follows this standard by requiring filers to submit 48-Hour reports for certain transactions that occur within the twenty days leading up to the date of the election. These reports must be filed within two business days of the transaction that triggered the reporting requirement. Transactions that trigger the need to file this report include receipt of a contribution over a certain amount based on the candidate's level of office (over $1,000 for Major offices, over $500 for District offices, or over $250 for Any/Other offices) or the expenditure of over $200 to any person who makes endorsements and who must file campaign disclosure reports.

[1] La. R.S. 18:1491.7 B (4) – (6) & La. R.S. 18:1495.5 B (4) – (6)
[2] La. R.S. 18:1495.5 D
[3] La. R.S. 18:1491.7 B (13) & La. R.S. 18:1495.5 B (12)
[4] La. R.S. 18:1491.7 B (4) & La. R.S. 18:1495.5 B (4)

In September 2024, the Board was asked to determine how often these 48-Hour reports were viewed through the Board's website. As such, Board staff provided the information in Appendix A that illustrated that even removing Board employees and automated data aggregators, over 90% of e-filed 48-Hour reports were viewed within 10 days of filing. This shows that there is public interest in these filings.

Another part of ensuring timely filings is educating filers on when their reports are due. State agencies can assist filers by posting deadline dates, sending reminder notices for upcoming or late reports, and hosting seminars that explain filing requirements and deadlines. The Board has always posted the filing schedules for each election cycle on the Board's website, typically over a year in advance of the primary election date. The filing schedules are also included as part of the paper packet that candidates receive upon qualifying for a particular office. By statute, the Board sends a certified notice when a filing deadline has been missed for a report that was required to be filed. In order to decrease the amount of time for notices to reach filers, in 2022, the Board additionally began sending reminder and past due e-mails to filers who gave an e-mail address to the Secretary of State at qualifying. Since the first quarter of 2024, the Board has set up a website to allow e-filers to update the e-mail address used for such reminders and notifications. Since 2020, the Board staff has provided online training classes after the close of qualifying to inform candidates of the filing requirements. The Board is currently researching ways to integrate deadline notifications into the LEADERS e-filing web portal so that when a filer logs into the portal, they can see what reports are currently expected from them. This feature is currently on a long term goal list with hopeful implementation within the next five years.

Accessibility of Data

Electronic Filing Requirements

In order for all filed campaign finance data to be readily searchable by the public, best practices suggest that all reports be filed electronically (Burgam, 2015). Of thirty-two states responding to our survey, twelve indicated that all filers are required to e-file. The benefit of having all campaign finance filers e-file their reports is that the data contained in those reports can be fully searchable by members of the public, whereas reports filed on paper must be examined individually to determine what information they contain.

One concern with requiring e-filing for all campaign finance filers is that it would be a barrier to entry with regard to participating in elections for those groups or individuals who may not have access to the technology required to e-file. The State of Washington has a novel approach to reducing this potential barrier. While Washington requires all campaign finance reports to be e-filed, there is an option to request an e-filing waiver for those who are able to show hardship with the e-filing requirement. Per discussion with Washington's Public Disclosure Commission's agency head, there are a handful of filers who are granted an e-filing waiver each year. Once received, their paper filed reports are transcribed into the e-filing system by commission staff members so that the data is fully searchable by the public.

In Louisiana, all of our campaign finance reports regarding campaign funding and expenditures are able to be filed electronically, but not all of our filers are required to e-file. Louisiana statute currently requires all Major and District level office candidates to e-file.[5] Candidates for Any/Other level offices are required to file campaign finance reports if they expend over $2,500 or collect contributions of over $200 from a single source (excluding their personal funds); however, they may file these reports on paper or electronically. Political Committees and Other Persons are required to file electronically when they

[5] La. R.S. 18:1485 C

receive contributions or loans in excess of $50,000 or make expenditures in excess of $50,000 within a particular calendar year.[6]

In September 2024, the Board was asked to determine how often reports filed by Any/Other level candidates are viewed through the Board's website. In pulling those statistics for comparison, Board staff also found how often reports filed by Major and District level candidates are viewed. This information can be found in Appendix B of this report, and it shows that the e-filed reports filed by Any/Other level candidates are viewed with much higher frequency than those filed on paper.

Based on filing statistics from 2022 and 2023 as shown in Table 2, roughly 30% of all campaign finance reports filed by Any/Other level candidates were filed electronically. Similarly, over 90% of all campaign finance reports filed by Political Committees were filed electronically.

Table 2 - Statistics for Campaign Finance Reports Filed Electronically and on Paper by Filer Level

	Campaign Finance Reports Filed in 2022			Campaign Finance Reports Filed in 2023		
Filer Type	**E-Filed Reports**	**Filed on Paper**	**Percentage E-Filed**	**E-Filed Reports**	**Filed on Paper**	**Percentage E-Filed**
All Filers	6,335	2,657	70%	10,052	1,896	84%
Major Level	788	0	100%	1,343	0	100%
District Level	2,024	3	100%	4,945	0	100%
Any/Other	1,045	2,431	30%	813	1,618	33%
PAC	2,453	221	92%	2,915	269	92%
Other Person	17	0	100%	31	7	82%
Recall	8	2	80%	5	2	71%

Table 3 - Statistics for Campaign Finance Filers who Filed Electronically and Those who Filed on Paper

	Campaign Finance Filers for 2022			Campaign Finance Filers for 2023		
Filer Type	**E-Filers**	**Paper Filers**	**E-Filer Percentage**	**E-Filers**	**Paper Filers**	**E-Filer Percentage**
All Filers	1,954	1,141	63%	2,376	881	73%
Major Level	335	0	100%	345	0	100%
District Level	994	3	100%	1,364	0	100%
Any/Other	302	1,064	22%	299	800	27%
PAC	315	73	81%	362	76	83%
Other Person	2	0	100%	3	3	50%
Recall	6	1	86%	3	2	60%

If the Louisiana public would like to search the data found in all filed campaign finance reports, then all campaign finance filers would need to be required to file electronically. Updating the e-file requirements would necessitate action by the Legislature. Based on the paper reports filed in 2022 and 2023 as shown in Table 2, the Louisiana Board of Ethics could expect an additional 1,800 to 2,700 e-filed reports per year. The e-filing system that is currently utilized by the Board should be able to handle the increase in e-filed reports with the current technologies available. Since these expected new e-filed reports would have been filed on paper instead and since processing e-filed reports requires less time than processing reports filed on paper, no additional funding would be needed by the Board for processing these reports. Based on the number of paper filers in 2022 and 2023 as shown in Table 3, the Board could expect between 800

[6] La. R.S. 18:1485 E

and 1,100 new e-filers each year. As such, an additional technical support position may be required in order to timely handle the increase in requests for e-filing credentials and e-filing support questions.

Searchable and Downloadable Campaign Finance Data

In order to be useful to the public, Campaign Finance Data should be presented in an easily searchable format. Additionally, the public should be able to download the data so that they can perform their own analysis on it. Louisiana offers multiple ways to search campaign finance reports and the information contained in electronically filed reports. For all reports, whether filed on paper or electronically, the Board allows searches by filer name, office city or parish, election year, and date report filed. For electronically filed reports, when searching for a specific filer or type of filer, the Board offers searches by filer name, office, election year, and date report filed. Additionally, more specific search pages targeting e-filed contributions, loans, and expenditures are available. These transaction-based searches give the ability to search by the transaction date, amount, and description, as well as the contributor or recipient name, city, state, and zip code. The only restriction is that the server is currently only able to return 500,000 records at a time.

While the Board does not currently have the full campaign finance e-filed database available to be downloaded through the website, the results of the contribution, expenditure, and loan searches can be exported in a comma-delimited format that can be opened with any spreadsheet or database program. Additionally, the schedules of every e-filed Campaign Finance Report can likewise be exported through the Board's website.

Forty-three other states also allow downloading of their e-filed campaign finance data. Many of them have limitations on the number of records that can be downloaded at one time. A few states only allow the public to export data from a single filer or report at a time. Several others have data files that are updated nightly and contain all e-filed information.

In order to allow the public and other entities to programmatically interface with their e-filed data, two states, Hawaii and Washington, currently host their e-filed campaign finance data on an application programming interface (API) capable open data portal. Hosting the data in this way, allows the public and other entities to access the data more freely and flexibly, to create their own graphs and views directly from the dataset, and to do so either through the web portal directly or programmatically using existing standard formats like SODA API or OData. Examples of the types of graphs that the general public can create based on access to this data are shown in Figure 8 and Figure 9.

In both Hawaii, with their Office of Enterprise Technology Services, and Washington, through their Consolidated Technology Services, the open data portal appears to be provided by a single technology centered agency to serve the entire state. Having a single entity host the datasets for all agencies allows the public to interact with the available data in a seamless way, potentially allows for volume pricing, and prevents each separate agency from requiring an open data expert. From this, it appears that best practices for providing API accessible open data at the state level is for a centralized agency to facilitate the hosting of datasets from multiple state agencies.

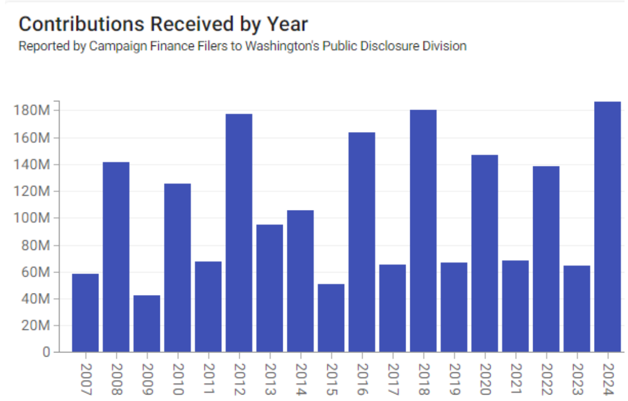

Figure 8 - Example graph created by Louisiana Ethics Board staff from Washington's open data repository. (Hawaii Campaign Spending Commission, 2024)

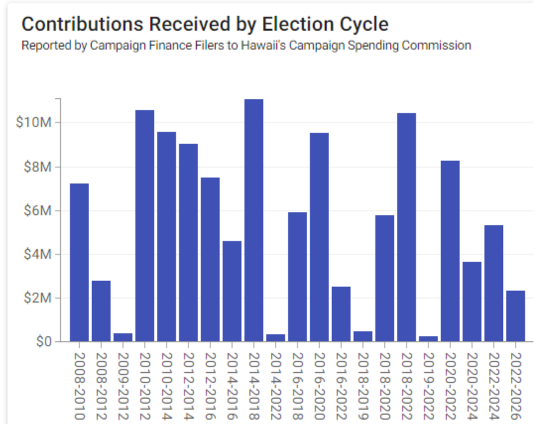

Figure 9 - Example graph created by Louisiana Ethics Board staff from Hawaii's open data repository. (Washington Public Disclosure Commission, 2024)

Allow Access to Campaign Finance Data at No Charge to the Public

All fifty states host websites that allow for free searching of reported campaign finance data, although some have limits with how far back the data is available. The Louisiana Board of Ethics allows free access to search filed campaign finance reports through the Board's website. All electronically filed reports are available for viewing, searching, and downloading the e-filed data. Paper reports filed 2005 and later are freely accessible through the website. Paper reports filed from 1998 to 2004 are available through public records request, as some of the forms used in those timeframes required social security numbers for election day workers to be reported. When such a request is received, members of the Board's staff redact any social security numbers found on the report prior to releasing it to the public. Paper reports filed prior to 1998 must be requested from archives since those reports were not scanned for web consumption.

In order to properly make those paper reports filed from 1998 to 2004 available to the public through the Board's website, the Board would need to contract with a third party or hire a temporary worker to check approximately 70,000 scanned reports for social security numbers and redact them as necessary.

Disclosure Reporting Best Practices

Both the Board and existing legislation makes a distinction between Campaign Finance Reports and Disclosure Reports. Typically, disclosure reports refer to reports that contain information about a candidate's or public servant's personal finances, usually including property holdings, business interests, investments, and other information as is found in Louisiana's Personal Financial Disclosure Reports. Similar reports are required by candidates, elected officials, and certain appointed officials within other states. Some states refer to these types of reports as Statements of Economic Interest.

In reviewing how these types of reports are handled by other states, the best practices for Disclosure Reports seem to be that they are available to the public and can be filed electronically. All but one state requires at least some candidates, elected officials, and certain appointed officials to file disclosure reports. In Louisiana, these reports are available to the public as soon as they are received, processed, and scanned into the web portal by Board staff. Thirty other states also allow the public to download the full disclosure reports for all filers, while four states only publish disclosure for certain filers, such as statewide candidates and office holders. The thirteen other states that require disclosure reports to be filed make them available to the public by official public records requests only.

Forty-three states, including Louisiana, allow e-filing of disclosure reports. Although e-filing is available for disclosure reports in Louisiana, it is not required. While ten to twenty percent of Tier 1 and Tier 2 filers submit their disclosure reports electronically, overall fewer than five percent of disclosure reports received are e-filed, as shown in Table 4. Due to this relatively low participation rate for e-filing, Louisiana does not currently have a publicly facing search for this e-filed data.

Table 4 - Personal Financial Disclosure Reports filed with the Louisiana Board of Ethics during 2023

Year Filed	Tier Level	Total Disclosure Reports Filed	Total E-filed Disclosure Reports	E-filed percentage of Total Reports Filed
2023	All	14,481	498	3.4%
2023	Tier 1	95	19	20.0%
2023	Tier 2	3,402	398	11.7%
2023	Tier 2.1	5,535	32	0.6%
2023	Tier 3	5,449	49	0.9%

Regarding disclosure reports, Louisiana is currently on par with most other states in making the filed reports available to the public. There is room for improvement if a higher percentage of filers e-filed these reports, either voluntarily or through changes in legislation. Since all candidates and elected office holders that have e-filing credentials for campaign finance e-filing can use the same credentials for filing disclosure reports, legislation to require the electronic filing of disclosure reports would not be over-burdensome for candidates/officeholders who are required to e-file their campaign finance reports. However, as Table 5 shows, there is not a distinct relationship between disclosure tier level and campaign finance candidate level.

Table 5 - Comparison of Campaign Finance Office Level to Disclosure Report Tier Level in Louisiana

Campaign Finance Office Level	Total Number of Offices	Required to File Tier 1	Required to File Tier 2	Required to File Tier 3
Major Level	60	7	53	0
District Level	567	0	555	12
Any/Other Level	2,798	0	683	2,115

Summary of Best Practices for Campaign Finance Reporting

As discussed in this report, Louisiana conforms with most of the best practices and compares well with the majority of states in terms of the type of information collected in campaign finance reports and the ways in which the public can interact with that data. However, there is always room for improvement. On the following pages, Table 6 lists the various ways that Louisiana and the Board could improve compliance with campaign finance reporting best practices. Additionally, estimates are offered for each potential improvement in terms of time and monetary cost for implementation. If legislative change is required to make such improvement, that fact is noted in the table as well.

The estimated time to implement the potential changes specified in Table 6 are made with the assumption that the additional positions requested by the Board for Fiscal Year 2025-2026 are allocated by the Legislature. If these positions are not allocated, the timeframes estimated would be greatly increased as the implementation and testing of these updates would need to be done in addition to the Board IT staff's current duties.

Table 6 - Summary of Potential Changes to Increase Louisiana's Compliance with Campaign Finance Reporting Best Practices

Data Completeness		
Require disclosure of contributor's occupation and employer		
	Legislation	This could only be implemented with new legislation requiring campaign finance filers to report the occupation and/or employer of each contributor. Potentially, as some other states do, the requirement could be based on a threshold of individual contribution amount or total given for a particular election cycle.
	In-House Estimate	If legislation passed to require this information for some or all contributors, it would necessitate campaign finance forms to be updated, and once the forms are approved, e-filing systems would need to be updated to accept and display the new fields as well. With current Board IT staff, if this was legislated and the project given precedence, it would require approximately six months to complete.
	Contract Estimate	Full cost of implementation is estimated to be between $ 35,000 - $ 50,000.
Identify the type of contributor (i.e., individual, business, non-profit, political committee, etc.)		
	Legislation	An update to legislation would be needed to require filers to categorize the type of contributor for each contribution.
	In-House Estimate	If legislation passed to require this information all contributors, it would necessitate campaign finance forms to be updated, and once the forms are approved, e-filing systems would need to be updated to display the new information as well. With current Board IT staff, if this was legislated and the project given precedence, it would require approximately three months to complete, since staff could utilize existing address book fields to help facilitate this update.
	Contract Estimate	Full cost of implementation is estimated to be between $ 17,000 - $ 50,000.
Categorize the type of expenditure (i.e., Advertising, Consulting, Fundraising, Legal Services, Polling, Printing, Salaries, etc.)		
	Legislation	An update to legislation would be needed to require all filers to categorize each expenditure reported into predefined types.
	In-House Estimate	If legislation passed to require this information for all expenditures, it would necessitate campaign finance forms to be updated, and once the forms are approved, e-filing systems would need to be updated to accept and display the new fields as well. With current Board IT staff, if this was legislated and the project given precedence, it would require approximately six months to complete.
	Contract Estimate	Full cost of implementation is estimated to be between $ 35,000 - $ 50,000.
Timeliness of Filings		
Assist filers in filing timely by integrating filing deadlines into campaign finance e-filing systems.		
	In-House Estimate	This involves linking information from the compliance side of campaign finance to the e-filing side so that the system can know what reports the Board is expecting from each individual candidate or committee. If this project was given precedence over existing projects, current Board IT staff could potentially integrate this change within six to twelve months.
	Contract Estimate	Full cost of implementation is estimated to be between $ 50,000 - $ 75,000.
Searchable and Downloadable Campaign Finance Data		
Require candidates at all levels to electronically file their campaign finance reports.		
	Legislation	An update to legislation would be needed to require all Any/Other level candidates to electronically file. If there is concern that this would present too high a barrier of entry for candidates with relatively few contributions or expenditures, legislation could include a threshold of activity level above which electronic filing would be required for Any/Other level candidates.
	In-House Estimate	Depending on the number of new e-filers that such legislation would generate each year, a new technical support position may be needed in order to properly and timely set up the new filers and respond to support questions.

	Implement a means for the public to download all e-filed campaign finance data.	
	In-House Estimate	If this project was prioritized above other existing projects, it would require about six months to complete.
	Contract Estimate	Full cost of implementation is estimated to be between $ 35,000 - $ 50,000.
	Implement automatically generated data models and maps based on e-filed campaign finance data.	
	In-House Estimate	For relatively simple graphs, such as total funds raised or total expenditures made per year (either by individual or for all e-filers), if this project was prioritized over existing projects, it would require Board IT staff approximately two to three months to complete. More complex graphs, such as heat maps for contributions received from different zip codes, could potentially add three to six months for the full project.
	Contract Estimate	Full cost of implementation is estimated to be between $ 17,000 - $ 25,000.
	Make campaign finance e-filed data accessible through an API integrated interface	
	In-House Estimate	With the current projects that are already planned, the Board's in-house IT staff would not have sufficient time to implement this project within the next three years. If Louisiana's Office of Information Technology is able to implement or host datasets from various agencies, the Board's in-house IT staff could work with their staff to define the campaign finance datasets and work on a method to update the hosted data at regular intervals.
	Contract Estimate	The costs to implement an open data compliant API integrated interface can vary significantly. In 2015, an article from LAist (Mendelson, 2015) illustrated this by pointing that various cities and counties in southern California paid between $600 and $25,000 per month for their OpenGov contracts. Hawaii, Washington, and Baton Rouge city-parish government use Tyler Technologies, Inc. (formerly Socrata) for their open data systems. Based on information from their open checkbook sites, Baton Rouge pays approximately $43,210 in annual open data maintenance (Baton Rouge Open Checkbook, 2024), and Washington's Consolidated Technology Services pays $78,840 annually to Tyler Technologies (Washington State Fiscal Information, 2024). Amazon Web Services and Microsoft Azure cloud services give ongoing monthly cost estimates ranging from $150 to $2,500 per month depending on the size of the dataset and how frequently it is utilized (i.e., how many service calls of various types and the size of the data pulled). These costs do not include potential set up costs for defining and initiating the datasets.
	Review scanned reports filed from 1998 to 2004 and redact as necessary with the goal of making these reports freely accessible to the public through our website.	
	In-House Estimate	If our current compliance officers could review 40 reports per day (about one hour's worth of work on top of their current workload), then the full project would require at least 2.5 years to complete.
	Contract Estimate	If the Board hired one or more temporary or contract workers to review the reports and assuming that they could review 40 reports per hour, the cost would be 1,750 hours of work. With a contract cost between $15 and $25 per hour, the total cost could range from $26,000 to $43,750.

Survey Analysis of Campaign Finance, Lobbying, and Personal Financial Disclosure Electronic Filing Systems Available in All Fifty States

Campaign Finance, Lobbying, and Disclosure laws play a crucial role in ensuring transparency, accountability, and fairness in elections by regulating how candidates and political committees raise, receive, and spend money and file reports; by requiring lobbyists to register and file expenditure reports; and by requiring elected officials and certain public officials to file personal financial disclosures. These laws vary significantly across the United States, and methods of collecting and displaying campaign finance and disclosure information to the public are also different from state to state. Therefore, to study best practices on collecting such information and displaying it to the public, the Board conducted a survey analysis by developing and sending an online survey to campaign finance and disclosure related state agencies in all fifty states. Survey analyses can serve as an effective tool to collect and analyze the data on these different filing requirements and processes. By doing so, it provides a snapshot on how well states are ensuring compliance with campaign finance and disclosure laws and which practices have been most effective.

Survey Design and Results

Board staff developed an online survey with a total of 21 questions that included sections about the contacted agency's description, disciplines covered, and electronic filing systems supported; the composition of the agency's information technology department; and general campaign finance questions. The full survey is provided in Appendix C. The link to the online survey was emailed to 70 ethics and campaign finance agencies at the beginning of August 2024 and was followed up with an additional reminder email at the end of August. The Louisiana Board of Ethics received completed surveys from 33 agencies spanning 27 states and corresponding to a 53% response rate from all 50 states.

Electronic Filing Requirements

Agencies were first asked about their electronic filing (e-filing) requirements. From 33 respondents, 15 (45%) agencies indicated that all filers are required to file electronically, five agencies (16%) indicated that electronic filing is not mandatory, and 13 (39%) agencies indicted that some filers are required to file electronically and some filers may file paper reports (hybrid filing).

Overall, the trend points strongly toward mandatory electronic filing, with a few exceptions. Even where e-filing is not mandatory, it is highly encouraged. The acceptance of paper filings appears to be diminishing, with most entities moving toward full electronic systems. Currently, Louisiana falls into the hybrid category, where some candidates are required to file electronically and some "any level" candidates are allowed to file on paper. In Louisiana, all lobbyists are required to e-file their reports.

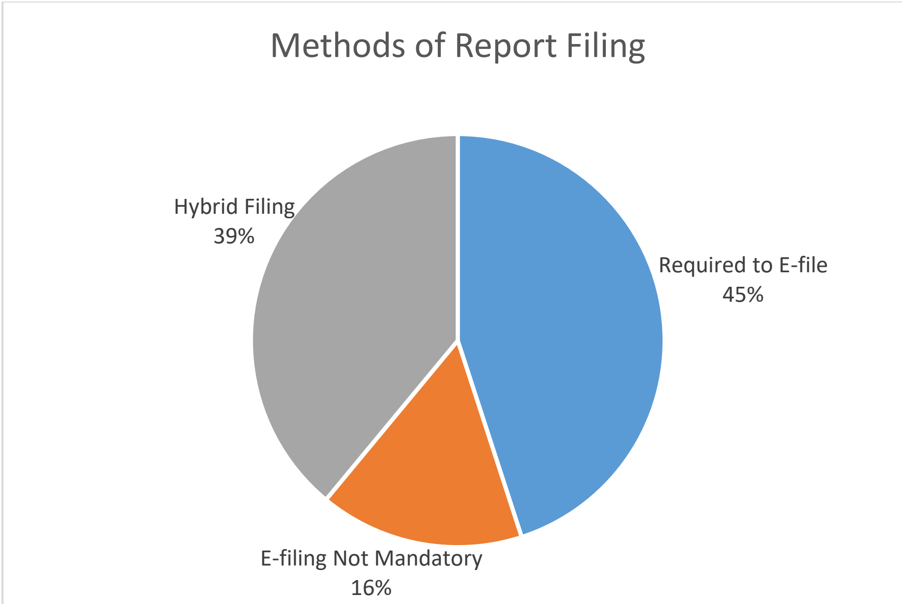

Figure 10 - Methods of Filing Reported by Surveyed State Agencies

On the question, "Does your agency have electronic filing for different disciplines," 21 respondents indicated the availability of an e-filing system for Campaign Finance, 18 responded for Personal Financial Disclosure, 18 states also indicated that they have an e-filing system for Lobbyists, 19 respondents indicated the availability of the e-filing system for Political Action Committees, and 17 indicated e-filing for Independent Expenditure Committees (Figure 11). Additionally, some states specifically provide e-filing systems to Nonprofits and Businesses.

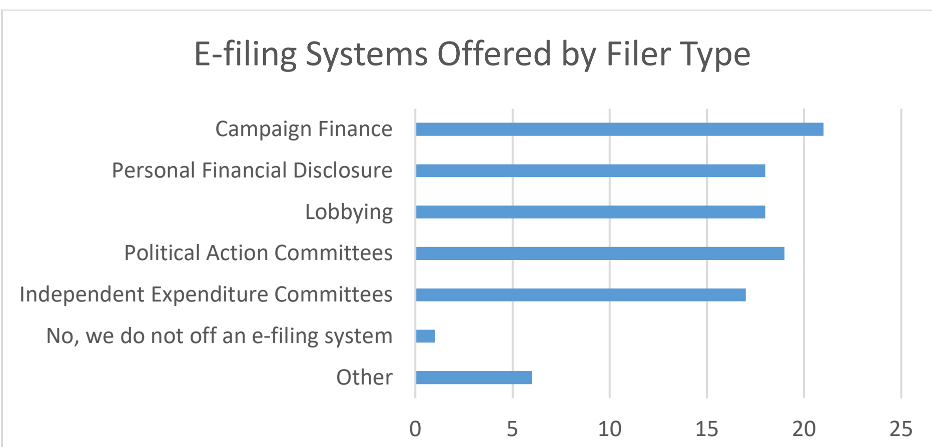

Figure 11 - E-filing Systems Offered by Various States for Different Filer Types

The board received 32 responses regarding a question about how many users your e-filing system supports per year. The highest number of users reported is 60,000, and the lowest is 700. As Figure 12 shows, the majority of the responding agencies support between 2,000 and 4,999 users. The Louisiana Board of Ethics falls within this group, supporting an average of 2,000 e-filers per year under Campaign Finance law, 800 under lobbyist law, and 400 e-filers under the Personal Financial Disclosure system.

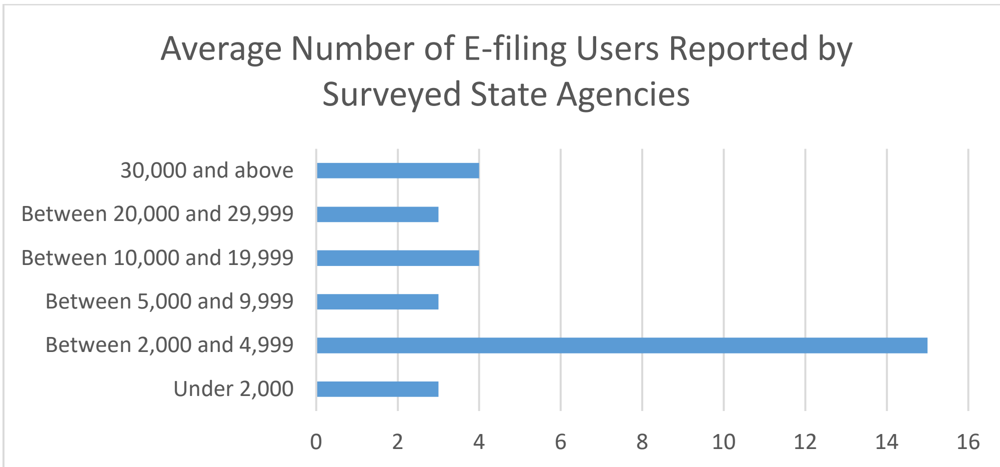

Figure 12 - Average Number of E-filing Users Reported by Surveyed State Agencies

Agencies with Outsourced E-filing Systems

Approximately half (48%) from the total of 33 respondents indicated that they outsourced the development of electronic filing, and 52% indicated that their e-filing system was developed in-house. For outsourcing, the most utilized company was Civix. Seven states indicated that their outsourced e-filing system was developed by Civix. Two states indicated that they contracted with Tyler Technology, and the rest of the states used Moss Rock, Civera, MapLight, Sapiens American Corporation and RFD. The agencies with outsourced e-filing systems spent on average of $822,222 for their systems. As Figure 13 shows, the lowest reported cost was $150,000 (for lobbyist and personal financial disclosure systems only), and the highest cost was $2.2 million (cost included development of Campaign Finance, Personal Financial Disclosure and Lobbyist e-filing systems). The average time to implement an outsourced e-filing system was approximately 16 months, with the longest period being 2.5 years and the shortest period being 8 months (which only included a system for Personal Financial Disclosure). Four states indicated a one year implementation period, and two states indicated two years.

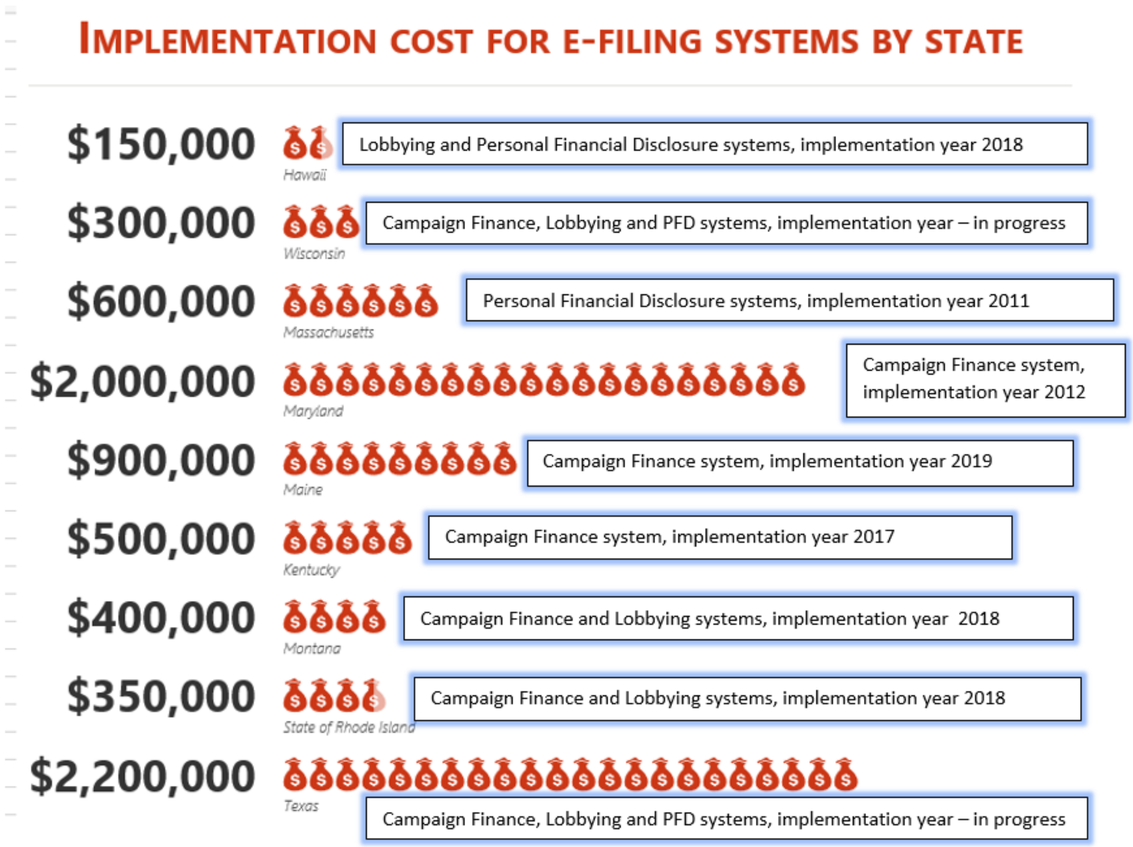

Figure 13 - Implementation Cost for E-filing Systems by State

The average annual support cost for outsourced e-filing systems was $131,597, with the highest reported annual cost of $350,000 per year (Figure 14). Seven states indicated that the annual support cost includes the contracted company providing technical support for users; whereas, six states indicated that their staff members provide technical support for users and assisting them with e-filing.

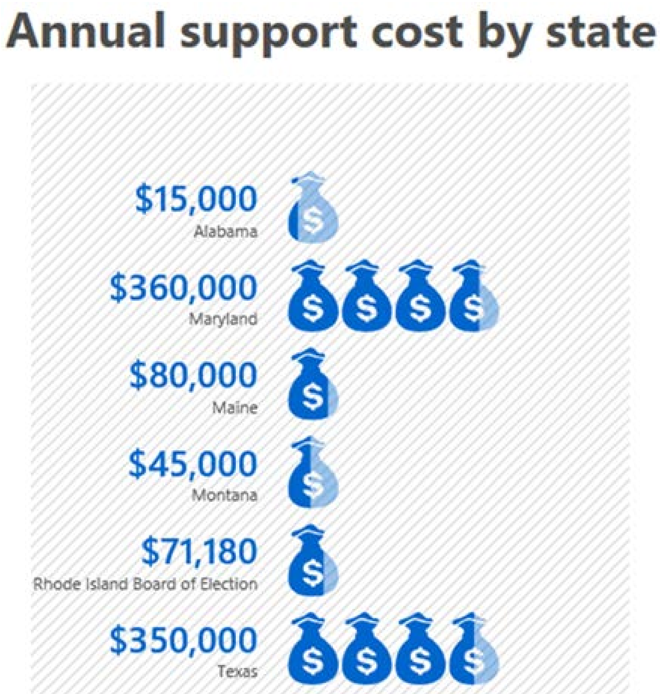

Figure 14 - Annual Cost for Support of E-filing Systems by State

For agencies that outsourced the development of their e-filing systems, four states dedicated two or three agency staff employees to the process, three states indicated that five employees participated in the process, and one state indicated that six employees were involved in the process.

Ongoing Technical Support is a necessity of managing and maintaining an electronic filing system. The following responses were received with regard to who provides technical support for users (Figure 15).

- Seven agencies (44%) reported that vendors are providing technical support for users.
- Six agencies reported that vendors are **not** providing technical support.
- Three agencies provided more detailed responses:
    - The State Office of Technology provides technical support.
    - Username and password issues are managed by the agency itself.
    - System errors are addressed by the vendor.

Vendor provides technical support for e-filers.

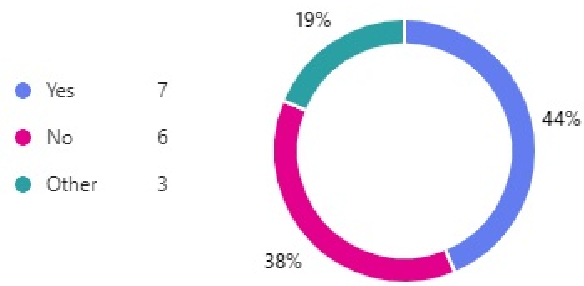

Figure 15 - Percentage of States where Vendors Provide Technical Support for E-filers.

Agencies with In-house Developed E-filing Systems

The development and maintenance of in-house e-filing systems across various agencies revealed notable differences based on the size and resources of their IT departments. Agencies typically spend around two years developing their e-filing systems with teams of 5 to 10 employees. Three reported having 30-50 IT staff, two between 10-20, and nine with 1-10. Most agencies (9) had 2-3 dedicated IT employees for maintaining and providing technical support specifically for their e-filing systems, while three agencies had only one, and two had none.

Agencies with larger IT departments developed more sophisticated e-filing features. These included:

- Single login for preparers to file for multiple candidates.
- Systems that track filing deadlines and send reminder emails.
- Real-time calculations of total contributions, expenditures, and debts for specific elections.
- A contribution import feature from the filer's accounting software.
- Submission of electronic data from third-party software.
- Integration of API technology at all levels of campaign filings, allowing for the generation of data models and maps.

These advanced features reflect the resources and staff dedication necessary to create and sustain robust e-filing systems.

Table 7 - List of States with In-house E-filing Systems and the Number of IT Employees each Employs.

Agency Name	**Number of IT employees**	**Type of E-filing systems**
Connecticut Office of State Ethics	2	Lobbying.
Connecticut State Elections Enforcement Agency	5	Campaign Finance; Elections.
Massachusetts Office of Campaign and Political Finance	3	Campaign Finance.
Ohio Ethics Commission	1	Personal Financial Disclosure.
New York State Board of Elections	30	Campaign Finance; Elections.
Oregon Secretary of State, Elections Division	40	Campaign Finance; Elections.
Tennessee Bureau of Ethics and Campaign Finance	State OIT	Campaign Finance; Lobbying; Political Action Committee; Independent Expenditure Committee; Personal Financial Disclosure.
North Carolina State Board of Elections	16	Campaign Finance; Elections.
Minnesota Campaign Finance and Public Disclosure Board	10	Campaign Finance; Lobbying; Ethics.
Pennsylvania State Ethics Commission	1	Ethics; Lobbying; Medical Marijuana & Gaming;
Virginia Department of Elections (ELECT)	50	Campaign Finance; Elections; Freedom of Information; Voter Registration.
Missouri Ethics Commission	6	Campaign Finance; Lobbying; Personal Financial Disclosure and Conflict of Interest.
Washington Public Disclosure Commission	9* *focused solely on the e-file systems	Campaign Finance; Lobbying; Financial disclosures of public officials.
Hawaii Campaign Spending Commission	1	Campaign Finance.
Louisiana Board of Ethics	3	Campaign Finance; Lobbying; Political Action Committee; Personal Financial Disclosure.

Best Practices for E-filing Systems

All agencies were asked to list if they used best practices for their e-filing systems. One of the most frequent best practices indicated was electronic data submission. Filing Campaign Finance or Personal Financial Disclosure reports electronically offers significant advantages over traditional paper filing. Electronic filing ensures faster submission and processing of submitted reports, which makes reported data more transparent. It also reduces the risk of errors, as many e-filing systems provide real-time validation for missing or incorrect information. Filers for most of the responding agencies (45%) are required to file electronically, while the rest of the agencies highly encourage candidates to file their reports electronically.

To determine additional best practices for e-filing systems, the Board survey asked each agency whether their e-filing systems contain specific features. The results of the agencies' responses are described below in Figure 16.

From 33 respondents, 13 agencies indicated that their systems allow filers to track deadlines, 17 agencies send email reminders, 14 agencies provide real-time calculation of contributions, expenditures, and loans for specific elections, 11 agencies indicated that their systems support contribution imports from filers' accounting software, 13 agencies indicated that their systems allow submission of electronic data from third-party software, 5 agencies support integration of application programming interface ("API") technology at all levels, and 7 agencies have the ability to generate data models and maps.

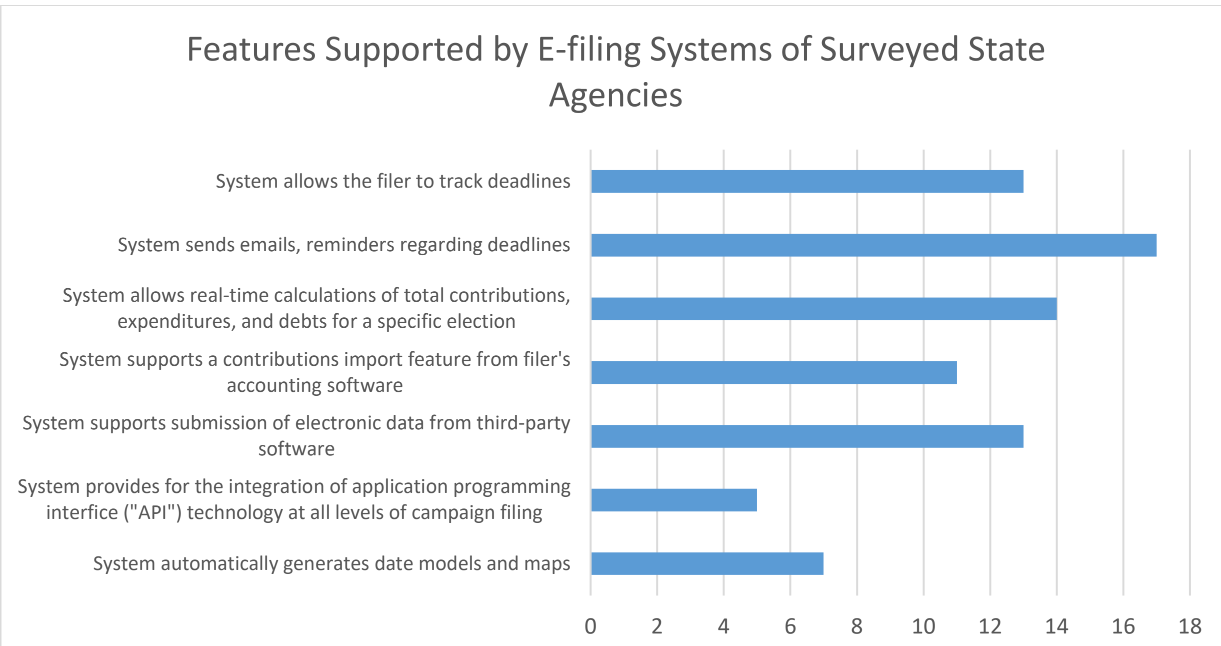

Figure 16 - Features Supported by E-filing Systems of Surveyed State Agencies

Additional information was sought via the survey regarding Campaign Finance filings, such as frequency of report filings, election report naming conventions, and whether candidates are allowed to reattribute and/or redesignate excessive contributions. The responses from these questions are shown in Figure 17 - Figure 19.

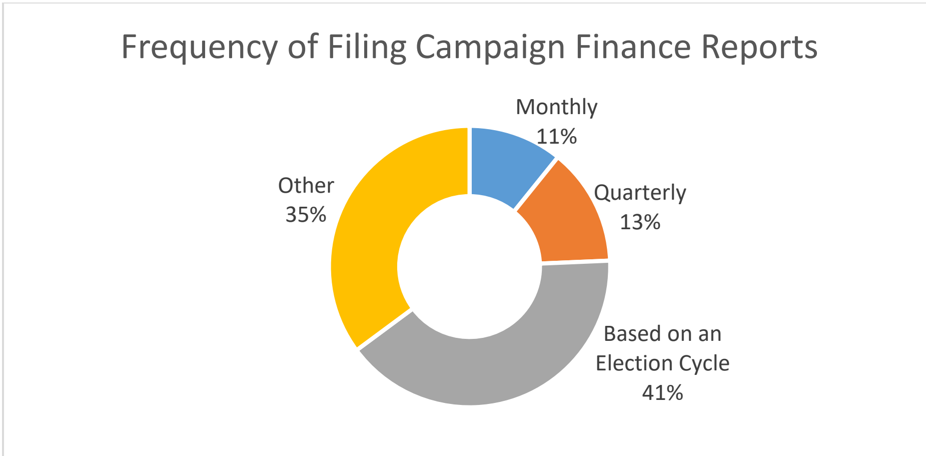

Figure 17 - Frequency of Filing Campaign Finance Reports in Surveyed in Surveyed States

Are Candidates Allowed to Redesignate Excessive Campaign Finance Contributions?

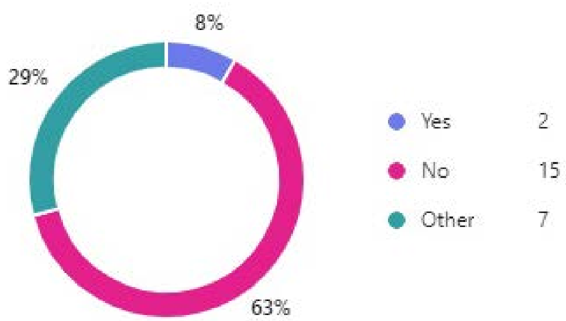

Figure 18 - Percentage of Surveyed States that Allow Redesignation of Excessive Campaign Finance Contributions

Are Candidates Allowed to Reattribute Excessive Campaign Finance Contributions

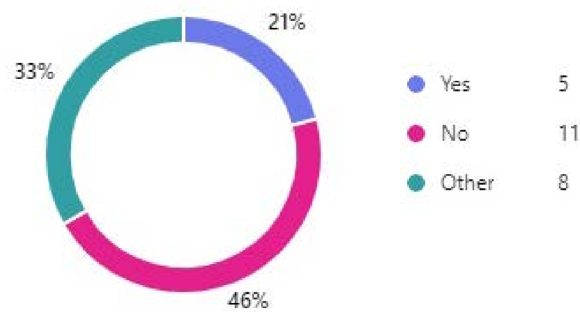

Figure 19 - Percentage of Surveyed States that Allow Reattribution of Excessive Campaign Finance Contributions

Survey Analysis for Current Users of Louisiana's Campaign Finance and Disclosure Electronic Filing System

As a final component of this study, Board staff created a survey intended for users familiar with Louisiana's current campaign finance and disclosure electronic filing systems. The survey asked individuals which e-filing systems they have used, how they would rate different aspects of the systems, and what suggestions they had for improving Louisiana's systems. The full content of the survey is shown in Appendix D.

The staff sent the survey electronically to thirty-five individuals who were identified as being an authorized report preparer for at least five different filers that have e-filed campaign finance or disclosure reports within the past year. Out of thirty-five individuals, twelve completed the survey.

The Board currently hosts three distinct websites for different portions of the campaign finance and disclosures e-filing system. Board staff refers to them as LEADERS Online, LEADERS PDP, and PFD E-file. LEADERS Online is the web-based campaign finance e-filing system used by the majority of campaign finance e-filers in Louisiana. LEADERS PDP allows e-filers to electronically submit campaign finance reports that were prepared using third-party software. PFD E-file is used to electronically file Personal Financial Disclosure reports.

Of those users completing the survey, all twelve have experience with filing campaign finance reports using LEADERS Online, four have filed reports prepared with third-party applications using LEADERS PDP, and six have filed personal financial disclosure reports using PFD E-file (Figure 20).

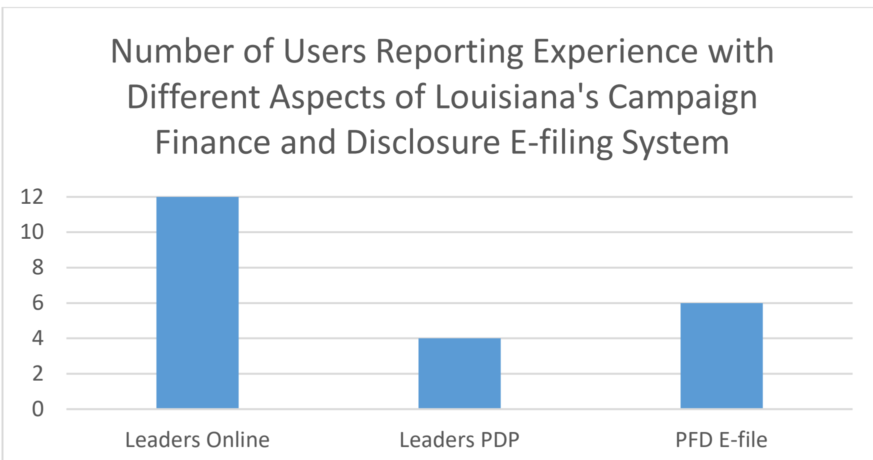

Figure 20 - Number of Users Responding to the Survey that Reported Experience with Different Aspects of Louisiana's Campaign Finance and Disclosure E-filing System

LEADERS Online Survey Results

As mentioned in the history portion of this report on page 4, the LEADERS Online web-based campaign finance filing system was launched in January 2015 and was the product of the Board's contract with a vendor. Since the system source code was one of the deliverables of the contract, over the past nine years, Board IT staff has performed bug fixes as needed, made updates as required per Legislative changes to the Campaign Finance Disclosure Act, implemented improvements to the performance and other aspects of the system, and added new features to assist filers.

When asking users their feedback of this system, the Board attempted to capture their overall satisfaction with the system, their perception on its ease of use, and the ease of report creation, data entry, and report submission. Respondents of the survey were asked to rate of these aspects of the LEADERS Online system using a standard star rating, ranging from one to five stars. As shown in Table 8, the results of the ratings show that the majority of users are relatively pleased with most of the aspects of LEADERS Online, except for data entry. Respondents had the opportunity to give additional comments regarding their ratings. These comments helped to explain that data entry was scored lower in part due to a lack of an import feature for reporting contributions and expenditures. All comments given regarding ratings for LEADERS Online are listed in Table 9.

Table 8 - LEADERS Online User Survey Results

Survey Questions Regarding LEADERS Online	**Average Rating**	★☆☆☆☆ **1-Star Ratings**	★★☆☆☆ **2-Star Ratings**	★★★☆☆ **3-Star Ratings**	★★★★☆ **4-Star Ratings**	★★★★★ **5-Star Ratings**
How would you rate your overall satisfaction with your experience?	3.9 ★★★★☆	0	1	2	6	3
How would you rate the overall ease of use?	4.2 ★★★★☆	0	0	3	4	5
How would you rate the report creation process?	4.2 ★★★★☆	0	0	3	4	5
How would you rate the data entry aspect?	3.6 ★★★☆☆	0	3	2	4	3
How would you rate the submission process?	4.7 ★★★★★	0	0	0	4	8

Table 9 - LEADERS Online User Survey Comments

Please use the space below if you would like to give an explanation for your ratings (optional). Listed below are all responses that were given by survey responders to this prompt regarding LEADERS Online.
• "The filing system from an electronic point of view is very good. The problem is in the administrative side of the Board of Ethics. Very cumbersome to set up new filers. Also, lack of focus on main function of the Ethics Board. Should establish an outreach program to educate the users and the public on the purpose and mechanics of the Campaign Finance and Disclosure rules." • "I have worked with programs like NGP that are so much easier to navigate. I will say that I have never had anything but total great help from the technical staff. They have always been so helpful." • "Maybe it's because I've been using the system for so many years, but I find all aspects of it to be easy to use." • "Your data entry database should have all public officials and candidates addresses listed so that a user could scroll down and pick the official's/candidate's qualifying address, rather than having to look it up online and manually enter into the report." • "The changes over the years have been helpful to search for information. Especially looking up Contributor totals. It would be nice to have an import/export feature to get data in rather than manually keying in all information. I do not use a 3rd party software due to support if errors arise. A sync or import with accounting information or CRM type software integration might be helpful for Candidates and/or PACs with a lot of data trying to be entered. I am thankful for all of the improvements over the past 20 years I have been using LEADERS." • "Data entry would be much easier if there as an option to upload an Excel file with transactions directly to LEADERS, similar to third parties rather than manually entering data."

LEADERS PDP Survey Results

The LEADERS PDP website allows filers to electronically file campaign finance reports that were generated using third-party systems to create specially formatted files that contain the report data. The current web-based version of LEADERS PDP has been operational since October 2016. Similar to LEADERS Online, Board IT staff maintains this system by making bug fixes and performing updates as needed.

When asking users for feedback on this system, the Board staff attempted to capture their overall satisfaction with the product as well as the file validation and report submission processes. Four of the survey respondents specified that they had experience using this system, and their survey results are summarized in Table 10. The results show that the overall satisfaction is mixed. Based on the comments, this stems from the cost of third-party systems and the difficulties encountered when attempting to hand-build a formatted file based on exports from third-party systems that do not automatically generate a properly formatted file for e-filing. Both users that left comments, indicated that their clients would use the LEADERS Online web-based system if it supported a data import feature. All comments given regarding the ratings for LEADERS PDP are shown in Table 11.

Table 10 - LEADERS PDP User Survey Results

Survey Questions Regarding LEADERS PDP	Average Rating	★☆☆☆☆ 1-Star Ratings	★★☆☆☆ 2-Star Ratings	★★★☆☆ 3-Star Ratings	★★★★☆ 4-Star Ratings	★★★★★ 5-Star Ratings
How would you rate your overall satisfaction with your experience?	3.0 ★★★☆☆	0	2	0	2	0
How would you rate the file validation process?	4.0 ★★★★☆	0	0	0	4	0
How would you rate the submission process?	4.3 ★★★★☆	0	0	0	3	1

Table 11 - LEADERS PDP User Survey Comments

Please use the space below if you would like to give an explanation for your ratings (optional). Listed below are all responses that were given by survey responders to this prompt regarding LEADERS PDP.
• "Currently use a third party for one client and we have to take what we pull from that third party and manually create a PDP. This is a pretty big headache but in one month, this monthly filer can have well over 200 contributions which is a lot to have to enter individually in online leaders. The process is very time consuming." • "From an Accountant point of view, third party systems are better to use than LEADERS mainly due to ability to upload/enter data easier and the management of the data; it's a huge plus to only enter data once then press a few buttons to submit. But costs for these third-party systems/tools are too much for some candidates and their budgets. This is why they opt for a more cost-friendly way, i.e. entering data view Excel/G-Sheets but with these options, you do double the work as you enter data in Excel/G-sheet for internal purposes, and again manually to LEADERS."

PFD E-file Survey Results

The PFD E-file web-based system is used to electronically file Personal Financial Disclosure reports. This system was launched in April 2016 and was the result of a contract between the Board and a vendor. Since the system source code was one of the deliverables of the contract, over the past eight years, Board IT staff has performed bug fixes as needed and made updates as required per Legislative changes.

When asking users their feedback of this system, the Board attempted to capture their overall satisfaction with the system, their perception on its ease of use, and the ease of report creation, data entry, and report submission. Six of the survey respondents specified that they had experience using this system, and their responses are summarized in Table 12. One of the respondents failed to give a rating for overall ease of use, leading that category to only have five responses instead of six. The PFD E-file system was rated very highly by all those responding to this portion of the survey. Based on the comments regarding the ratings, most respondents found this system easier to use particularly due to the ability to copy the prior year's report when preparing for the current year. All comments given regarding the ratings for the PFD E-file system are listed in Table 13.

Table 12 - PFD E-file User Survey Results

Survey Questions Regarding PFD E-file	**Average Rating**	★☆☆☆☆ **1-Star Ratings**	★★☆☆☆ **2-Star Ratings**	★★★☆☆ **3-Star Ratings**	★★★★☆ **4-Star Ratings**	★★★★★ **5-Star Ratings**
How would you rate your overall satisfaction with your experience?	4.5 ★★★★☆	0	0	0	3	3
How would you rate the overall ease of use?	4.2 ★★★★☆	0	0	0	4	1
How would you rate the report creation process?	4.7 ★★★★★	0	0	0	2	4
How would you rate the data entry aspect?	4.7 ★★★★★	0	0	0	2	4
How would you rate the submission process?	4.7 ★★★★★	0	0	0	2	4

Table 13 - PFD E-file User Survey Comments

Please use the space below if you would like to give an explanation for your ratings (optional). Listed below are all responses that were given by survey responders to this prompt regarding PFD E-file.
• "I find this system easy to use as well." • "Love the PFD e-filing side. I love how you can copy the prior report and go in and edit what changes there are vs having to enter in the same data from previous reports. It would be nice if there was a way to copy a form but change the actual form from say a form 416b to 416a." • "The only change I could recommend would be the ability to duplicate the prior year report and make changes for the year being prepared. I have found that clients personal financial information vary very little from year to year." *Staff comment: The PFD E-file system currently includes this feature although its availability may need to be emphasized more.* • "This is one of the better filing options Ethics of LA offers in my opinion. It's very simple and straight forward for the user. If there are opportunities to merge this option of filing with other reports/filings, I strongly believe it'll make a lot of folks in my profession, Accounting/Finance, lives much easier and highly likely to reduce errors in filings."

Survey Results regarding Support Calls Fielded by Board Staff

When users run into an issue with an e-filing system or have a question regarding electronic filing, they can call the Board of Ethics office and speak to a staff member in the Campaign Finance, Disclosure, or IT divisions, depending on the type of issue or question they have. Since Board staff are the ones who support these systems and answer these questions, the Board also wanted to discover if there were any improvements that might be needed with how the staff handles these types of questions. With that thought, the Board staff asked users to rate how quickly they were able to speak with a staff member, how well the staff member was able to respond to their questions, the professionalism of the staff member, and the user's overall satisfaction with the interaction. Based on the ratings given by all twelve of the survey respondents, the reviews for staff interactions were overwhelmingly positive as shown in Table 14. As with the prior sections, respondents were given an opportunity to comment on their ratings. All comments given regarding support calls fielded by Board staff are listed in Table 15.

Table 14 - User Survey Results Regarding Support Calls Fielded by Board Staff

Survey Questions Regarding Support Calls with Board Staff	**Average Rating**	★☆☆☆☆ **1-Star Ratings**	★★☆☆☆ **2-Star Ratings**	★★★☆☆ **3-Star Ratings**	★★★★☆ **4-Star Ratings**	★★★★★ **5-Star Ratings**
The speed at which you were able to speak with a staff member	4.8 ★★★★★	0	0	0	3	9
The ability of the staff member to accurately respond to your questions or issues	4.9 ★★★★★	0	0	0	1	11
The professionalism of the staff member	4.8 ★★★★★	0	0	1	1	10
Overall satisfaction with the interaction	4.8 ★★★★★	0	0	0	2	10

Table 15 – User Comments Regarding Support Calls Fielded by Board Staff

Please use the space below if you would like to give an explanation for your ratings (optional). Listed below are all responses that were given by survey responders to this prompt regarding support calls fielded by Board staff.
• "Sometimes I find the feedback a little over my head, even though I am reasonably intelligent" • "I cannot say enough good things about my interactions with all staff in this department for over 30 years. Questions about PAC and candidate reporting issues are always answered promptly, IT problems are always handled easily." • "It is because of the level of service I have received from staff members regarding online filing that I have not encouraged clients to use third party software and continue using online leaders. On filing deadlines, if the servers are slowing, I know regardless of the time, I can pick up the phone and staff member will assist me with the issue. I can't say enough great things about the staff and all of their hard work. I have never had an issue with any member and have always been helped and treated with the highest level of professionalism." • "Everyone has been kind and professional." • "Every person I have spoken with in campaign finance has always been so helpful! Definitely makes me, as a preparer, confident that questions/issues are answered." • "I have had nothing but positive interactions with folks in the Ethics office - even when the news weren't as good for me and/or clients. They answered questions and timely responded to my calls/requests."

Top Features Requested by Survey Respondents

The final part of the user survey asked respondents for their top five updates that they would like to see made to these e-filing systems. All of the suggestions listed by survey respondents are shown in Table 16 along with the number of individuals who mentioned that suggestion. The suggestions have been grouped into four categories: data import, date entry improvements, suggestions that would require Legislative action to implement, and other.

Almost half of the survey respondents would like to have the ability to import contribution and expenditure data into LEADERS Online either by using a spreadsheet formatted file or by utilizing API to communicate directly with third party systems, such as online fundraising platforms. Another interesting data import suggestion was to link LEADERS Online to an online database of names and addresses for public officials and candidates so that those fields can be auto-filled when entering interactions with those individuals. While it might be possible to integrate an import feature into the current version of

LEADERS Online, it would take time and resources to do properly. The potential for implementing this feature is discussed in more details in the Cost/Benefit Analysis section starting on page 31.

Many of the suggested data entry improvements are items that the Board IT staff will be able to research and see if they can be implemented as part of routine system maintenance. Some suggestions, such as performing bulk actions or updating the web-page flow to make date entry more keyboard friendly, may be more difficult to implement than others; however, they all offer a unique perspective on how Board staff could attempt to make these e-filing systems a little more user friendly.

Table 16 - Features Suggested by Survey Respondents

Features Suggested by Survey Respondents		**# Suggesting**
Data Import		
	Ability to Import Contributions/Expenditures with a spreadsheet formatted file or through integration with online fundraising platforms.	5
	Ability to access and use an existing public official and candidate address database to auto-fill those fields when contributions or expenditures are tied to those individuals.	1
Data Entry Improvements		
	Making data entry more keyboard friendly by reducing mouse actions.	1
	Ability to set sorting preferences for print preview and entered data.	1
	Updating the default for filtering lists of data from “equals” to “contains” so that the more flexible search is prioritized.	1
	Ability to access the address book from any screen.	1
	Ability to change the report type after starting a campaign finance filing.	1
	Ability to change a personal financial disclosure report from an annual to a candidate subtype of the same tier level.	1
	Ability to perform bulk actions, such as deleting or editing the classification or spelling of transactions as a group.	1
Suggestions that Would Require Legislative Action		
	Making the zip code optional for addresses.	1
	Ability to report a web address instead of a mailing address for expenditures.	1
Other		
	Adding more support for customer relationship management where more information on contributors can be included and reports pulled based on contributors’ information.	1

Cost and Benefit Analysis for Updating Board of Ethics E-filing Systems with Features Specified in Act No. 664

Act No. 664 instructed the Board to review the potential costs and benefits of implementing updates to the Board's e-filing systems to provide for the following features: single sign-on for each user filing for multiple campaigns or committees, deadline tracking, real-time calculations of total expenditures and debts, simplified digital templates, the integration of API technology within campaign finance e-filing, and automatically generated data models and maps (like those implemented by the Washington State Public Disclosure Commission.) This section of the report will look at the benefits of each requested feature as well as the estimated cost to implement that feature. The estimated time for Board staff to implement these features are made with the assumption that the additional positions requested by the Board for Fiscal Year 2025-2026 are allocated by the Legislature. If the positions are not allocated, the timeframes estimated would be greatly increased as the implementation and testing of these updates would need to be done in addition to the Board IT staff's current duties. This section closes with an analysis and discussion on the potential costs and merits of contracting with a vendor to create a new campaign finance e-filing system specifically built with the requested features in mind.

Single Sign-On for each User Capable of Filing for Multiple Campaigns or Committees

This requested feature would allow each authorized report preparer to have a single account name and password in order to access and submit filings for those campaigns or committees that they have been authorized to access. This feature would clearly benefit preparers who file for multiple campaigns and committees and simplify their log-in process when they are intending on working on reports for multiple filers in one session. Unfortunately, due to the way the current system is designed, there would not be a straight forward way to integrate this feature into the current e-filing system. If the Board were asked to implement this feature, it would most likely be contracted out as part of creating a new e-filing system with a corresponding cost as listed in the estimate on page 33.

Deadline Tracking within the E-filing System

Including deadline tracking within the e-filing system could help filers to submit their reports more timely and in the proper order. As mentioned in the Timeliness of Filings section on page 9, in order to help filers submit their reports timely, Board staff currently sends reminder e-mails before the deadline date as well as failure to file e-mails on the day after the deadline to all filers who gave an e-mail address to the Secretary of State at qualifying. This suggestion is a little different from that one in that it suggests the integration of deadline tracking within the e-filing system so that when a filer logs into the system, they can see upcoming and previous missed deadlines as well as what type of reports are required on those deadlines. As mentioned in Table 6 on page 15, adding this feature to LEADERS Online would take current Board IT staff six to twelve months to properly implement. If the Board contracted with a third-party vendor, staff estimates that it could cost $50,000 to $70,000 for this feature alone.

Real-Time Calculations of Total Expenditures and Debts

LEADERS Online currently has real-time calculations for total expenditures and debts for items listed on a particular report; however, this request would add the ability for LEADERS Online to list all expenditures or debts reported for a particular election cycle in one place. LEADERS Online already has a similar feature that lists all reported contributions for a particular election cycle. This feature would assist filers if they perform regular audits of their reporting by comparing it to their bank statements, especially if the bank statements end up covering multiple reporting periods. Since this is similar to an existing feature, Board IT staff should be able to add a comparable feature for expenditures within a couple of months.

Simplified Digital Templates

Simplified digital templates seem to be related to adding the support for data imports. As mentioned in the Top Features Requested by Survey Respondents on page 29, adding the support for importing contributions and expenditures was by far the most requested feature. Including this feature in the e-filing systems would benefit report preparers and filers who use third-party accounting systems to keep track of their contributions and expenditures. In such a scenario, having an import feature could greatly reduce the amount of time necessary to enter the information into the e-filing system and potentially improve the accuracy of the information that is entered. The most straightforward and globally accessible way of allowing this type of import would be to allow the import of contributions and expenditures using a spreadsheet formatted file with predefined data columns for each schedule. Most accounting software allows users to export data in such a fashion. Implementing this import feature would require a delicate balance between ease of use for the filers and accurate reporting when dealing with potential duplicates. Any import system would need to account for duplications of contributor names, since they could affect the system's ability to accurately calculate the total contributions received during the election cycle from a particular contributor. The third-party systems that were reviewed by Board staff all included additional steps for the filer to complete, making decisions on whether a particular entity in the imported data is the same as another, similar entity that is already in their e-filing address book. In order to implement this process properly, it would most likely take Board IT staff well over a year to create. If the Board were to issue a Request for Proposals for this feature, staff estimates that the contract could cost between $70,000 and $150,000.

Integration of API Technology within Campaign Finance E-filing

Application Programming Interface (API) technology allows entities to interact more freely with datasets and allows for direct communication from application to application. As mentioned in the section on Searchable and Downloadable Campaign Finance Data beginning on page 12, having this access to filed campaign finance data allows the general public and other legal entities the ability to more flexibly search through the data and create their own graphs based on the results. The general public and news agencies could benefit from such access to the data by potentially being able to gather deeper understandings on how campaigns are funded and how the contributions are used. The two states that allow this type of access to e-filed campaign finance data utilize open data systems that are administered by their version of the Office of Information Technology (OIT) for all state agencies. Having this type of system operated by OIT would allow the state to focus the expertise within one agency instead of requiring open data experts within each agency. The cost for creating and hosting these types of open data portals vary greatly with costs reported from various cities in California ranging from $600 to $25,000 per month (Mendelson, 2015).

Another way to integrate API technology into campaign finance e-filing would be to allow direct imports of contributions or expenditures from other web-based accounting or fundraising systems. This would benefit filers and preparers who use such web-based systems that also allow for API integration with external systems by reducing the time needed for data entry. This is distinct from the data import feature mentioned in the prior section as it potentially removes the need for filers to export their data into a spreadsheet formatted file. Instead, the e-filing system would use API to communicate directly with the filer's web-based accounting or fundraising systems in order to receive the contribution and expenditure data. One of the main difficulties with implementing this type of system is selecting which external web-based systems to support, since the API communication would be unique between each external system.

Additionally, this type of import would still require some method to deal with the potential duplication of contributors as discussed in the prior section. As the system currently stands, LEADERS Online would not be able to support this feature. If the Board were to implement a new e-filing system, it could potentially be built or contracted with this in mind; however, the Board would still need to decide which specific external systems to support with each supported system adding to the overall cost to create and maintain the e-filing system.

Addition of Automatically Generated Data Models and Maps

Automatically generated data models and maps, like those used in the State of Washington, allow for a graphical representation of e-filed campaign finance data. As shown on pages 6 and 8 of this report, these types of graphs help to summarize campaign fundraising and spending. They can illustrate where money to fund campaigns is coming from as well as how that money is utilized. The addition of relatively simple graphs, such as total funds raised or total expenditures made per year, to the Board's campaign finance search site would take Board IT staff approximately two to three months to complete. More complex graphs, such as heat maps for contributions received from different zip codes, could potentially add three to six months to the full project. Contracting with a third part for these types of graphs could run from $17,000 to $50,000 depending on the types of graphs involved.

As discussed in sections beginning on pages 5 and 7, if the Legislature updated the campaign finance filing requirements to include specifying the type of entity for each contribution and the category of expense for each expenditure, then graphs could be generated to illustrate more succinctly what types of entities are funding each campaign and on which categories of expenditures are the campaigns spending these contributions

Estimated Cost for a New or Updated System Developed by Contracted Third-Party

One approach to creating a new e-filing system is to publish a request for proposals and contract with a third-party vendor. Based on the costs reported by other states as shown in Figure 13 on page 20 of this report, such a contract to create a new system could cost between $300,000 and $2,200,000; however, the cost to include all of the requested features would possibly be towards the higher end of that range. As reported by surveyed state agencies, there could be an additional annual cost between $15,000 and $360,000 as show in Figure 14 on page 21. It is difficult to have a more accurate cost estimate without producing a request for proposals that includes the specific features that are being required by the new system.

From the Board's prior experience with contracting for new e-filing systems, any request for proposals (RFP) generated would probably include the requirement that the source code for the new system be included in the final project deliverables. Requiring access to the source code would allow Board IT staff to maintain and make necessary updates over time as campaign finance reporting requirements change. This can increase the longevity of the system by allowing changes to be made even if the contracted vendor no longer exists at the time when the changes are mandated. Including source code delivery as part of the RFP could potentially increase the initial cost of the system but would hopefully reduce the annual support cost needed once the system is in place.

Estimated Cost if Added to the Existing System by Board IT Staff

The Board currently has three employees in its IT staff. While the positions are listed as an IT director, an applications specialist, and an application programmer/analyst, these IT professionals are serving as the backbone for technology-driven processes and ensuring seamless communication, data management, system functionality, and safeguarding sensitive data from cyber threats. In addition to supporting, maintaining, and enhancing the Board's internal software applications and database systems, they create, maintain, and enhance the Board's public-facing website. This includes integrating the Board's websites with third-party systems, as well as maintaining and updating the Board's e-filing systems. Additionally, they pull reports based on data requests, collaborate with other departments to optimize workflows through technology, reduce data entry, and help to create new forms for public use based on Legislative action. They serve as in-house technical support for any hardware and software issues encountered by Board staff members, and they also field support calls from the public regarding e-filing, access to the ethics training, and other general questions regarding the website. For Fiscal Year 2025-2026, the Board is requesting two additional programmer positions to assist with the current workload and the coming updates that must be implemented to comply with new Legislation.

As shown in Table 7 on page 22, most states that handle the same types of reporting requirements as the Board (namely Campaign Finance, Lobbying, Disclosures, and Ethics reports) have larger IT departments. Since Washington State was specifically mentioned in Act No. 664, Board staff interviewed Washington's Public Disclosure Commission's agency head and IT director. Through that interview, the Board discovered that their agency has nine IT staff whose sole responsibility is maintaining and updating their e-filing system. If the Board was able to hire additional programmers for a larger IT group, then the IT group would be able to form teams of programmers who could focus on updating and enhancing specific systems which would allow it to be able to incorporate more features at more regular intervals. Ideally, the Board would like to eventually expand its IT group to a total of seven positions, with three focused on maintaining and improving the e-filing systems, including the systems that allow filers to enter the required information, that help the public meaningfully interact with the filed data, and that assist the Board staff with reviewing and processing the reports.

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Louisiana Board of Ethics

Appendix A

Campaign Finance and Disclosure
Systems Best Practices

Appendix A - Stats on the Frequency at which People View 48-Hour Campaign Finance Reports Filed by All Candidates

The number of reports viewed and the number of clicks-to-view for each report were determined by comparing the web server logs to the list of filed reports. In order to most accurately count clicks made by actual end users of our website, we removed clicks made by Ethics Board staff members from their office computers and clicks from IP-addresses that were identified as probable automated data aggregators.

Due to a server upgrade in 2022, the web server logs for 2022 begin in June. As such, the data for 2022 is reported for those reports filed and viewed between July 1, 2022 and December 31, 2022. The 2023 data covers the full calendar year.

This section focuses on the 48-Hour reports and answers the following questions for all candidates together and for Major, District, and Any/Other candidates separately. Since Major and District level candidates are all required to electronically file their reports, we list the results for all Any/Other Office Candidates as well as showing the subsets for those reports filed on paper and those filed electronically.

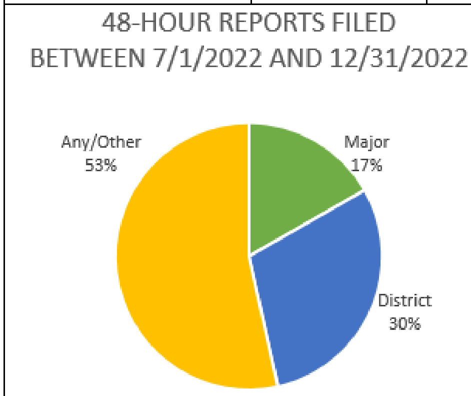
1. How many 48-hour reports were filed in 2022 and 2023?
    - For reports filed on paper, the date filed is based on the date that the report was originally filed, i.e., date faxed, uploaded, hand delivered, or postmarked. Paper filed original and amended reports are counted as a single report since they are physically processed together.
    - For electronically filed reports, the date filed is based on the date each individual report was submitted. Electronically filed original and amended reports are counted as separate reports since they are each submitted as full reports.
2. Of those reports filed, how many were viewed in 2022 and 2023?
    - For each year, the number of reports that were filed and viewed in that year is listed as well as what percentage that number represents of all reports filed in that year.
3. Of reports filed, how many total clicks-to-view were there in 2022 and 2023?
    - The overall number of clicks-to-view reports that were filed within the particular year is listed as well as the average number of clicks-to-view per report viewed.
4. How many reports were viewed within 10 days of filing?
    - With this statistic, we were attempting to determine how many of the 48-Hour reports were viewed in a “timely” manner since the information that they contain will eventually appear on a later report.
    - The number of reports filed in the particular year that were viewed 10 days of filing is listed as well as what percentage that number represents of all reports filed in that year.
5. How many views occurred within 10 days of filing?
    - With this statistic, we were attempting to determine how frequently the 48-Hour reports were viewed in a “timely” manner since the information that they contain will eventually appear on a later report.
    - The overall number of clicks-to-view reports within 10 days of the report’s filing is listed as well as the average number of clicks-to-view per report viewed.

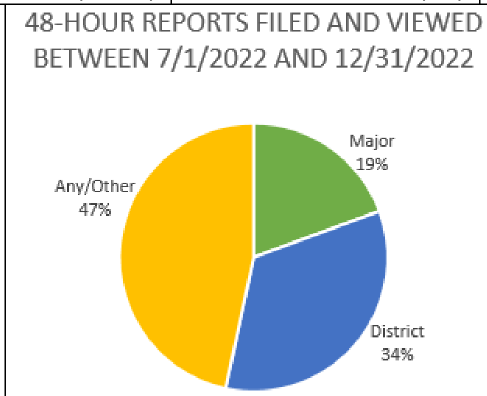
After each dataset, there three pie charts that illustrate the percentage of the different types of filers as regards to number of reports filed, number of those reports viewed, and total number of clicks-to-view.

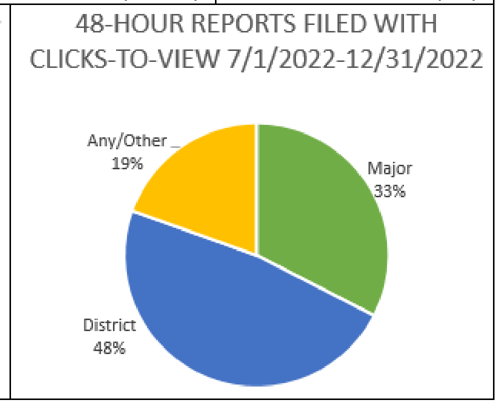
Additionally, there are two bar graphs that show the relative percentage of filed reports viewed as well as the average clicks-to-view per report for the different types of filers.

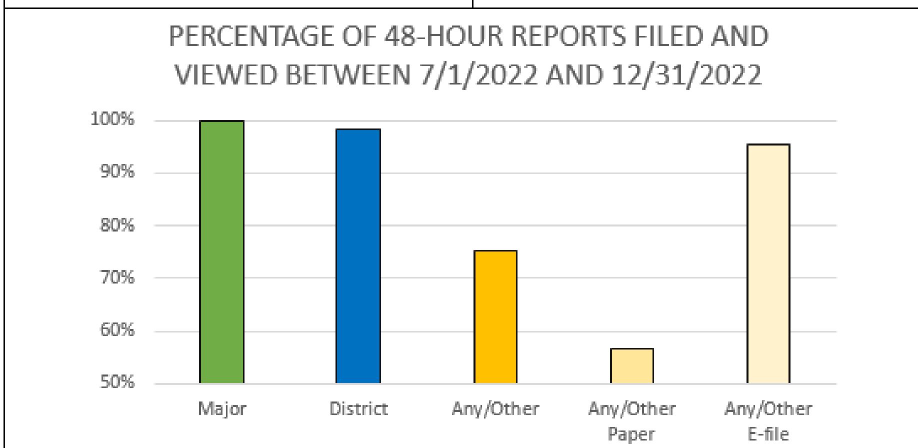
48-Hour Reports in 2022 (between 7/1/2022 and 12/31/2022)

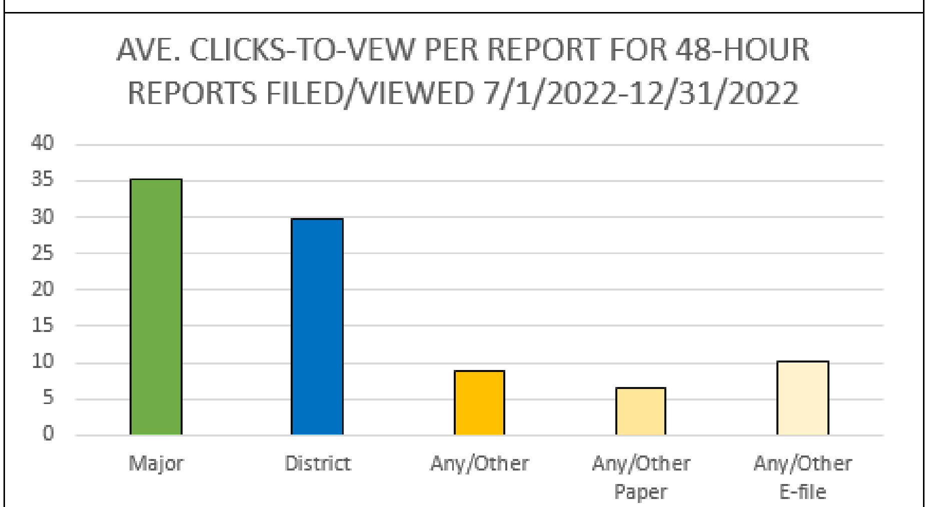
	How may 48-hour reports were filed in 2022?	Of reports filed, how many were viewed in 2022? (% viewed)	Of reports filed, how many total clicks-to-view were there in 2022? (Ave. views/report)	How many reports were viewed within 10 days of filing? (% viewed)	How many views occurred within 10 days of filing? (Ave. views/report)
All Candidates	430	371 (86%)	7,813 (21)	344 (80%)	5,638 (16)
Major	72	72 (100%)	2,543 (35)	72 (100%)	1,979 (27)
District	128	126 (98%)	3,745 (30)	126 (98%)	2,749 (22)
Any/Other	230	173 (75%)	1,525 (9)	146 (63%)	910 (6)
Any/Other – Paper	120	68 (57%)	448 (7)	48 (40%)	232 (5)
Any/Other – E-filed	110	105 (95%)	1,077 (10)	98 (89%)	678 (7)





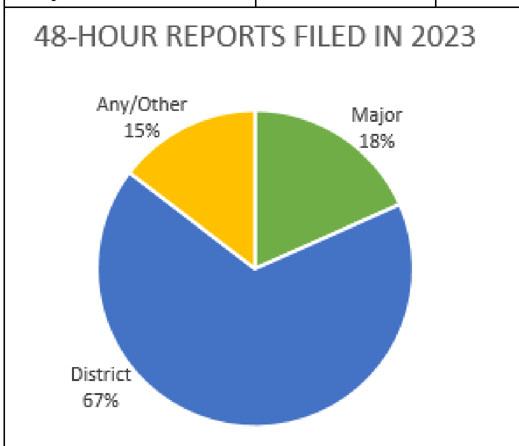


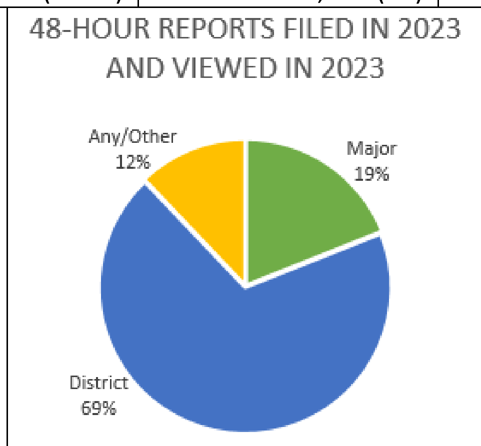


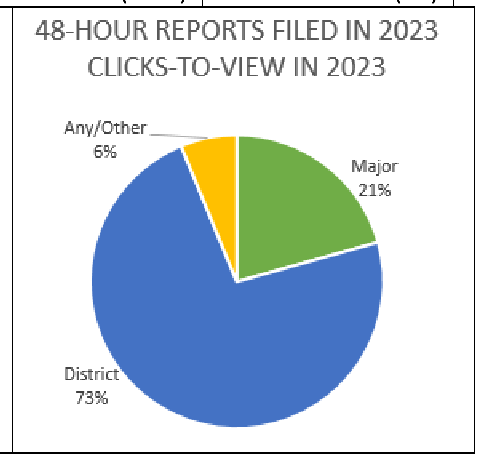


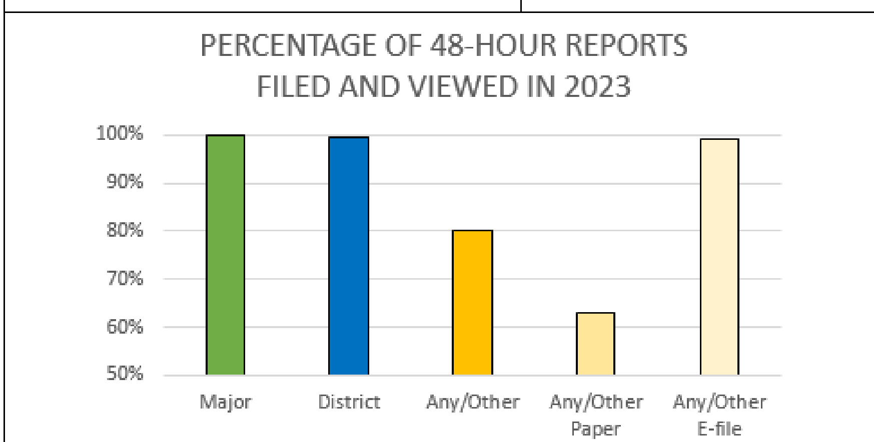
48-Hour Reports in 2023 (between 1/1/2023 and 12/31/2023)

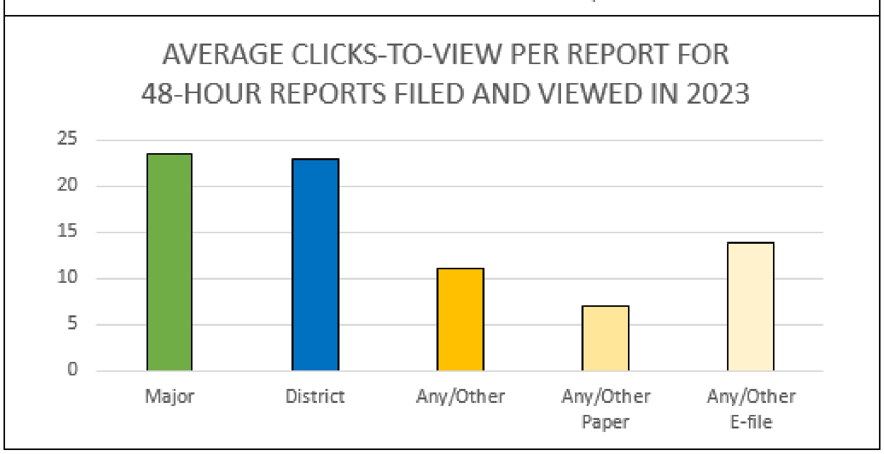
	How may 48-hour reports were filed in 2023?	Of reports filed, how many were viewed in 2023? (% viewed)	Of reports filed, how many total clicks-to-view were there in 2023? (Ave. views/report)	How many reports were viewed within 10 days of filing? (% viewed)	How many views occurred within 10 days of filing? (Ave. views/report)
All Candidates	1,471	1,423 (97%)	30,640 (22)	1,356 (92%)	18,867 (14)
Major	270	270 (100%)	6,336 (23)	268 (99%)	4,493 (17)
District	986	981 (99%)	22,403 (23)	952 (97%)	13,376 (14)
Any/Other	215	172 (80%)	1,901 (11)	136 (63%)	998 (7)
Any/Other – Paper	113	71 (63%)	499 (7)	41 (36%)	167 (4)
Any/Other – E-filed	102	101 (99%)	1,402 (14)	95 (93%)	831 (9)











Louisiana Board of Ethics

Appendix B

Campaign Finance and Disclosure
Systems Best Practices

Appendix B - Stats on the Frequency at which People View Campaign Finance Reports Filed by Any/Other Office Candidates

The number of reports viewed and the number of clicks-to-view for each report were determined by comparing the web server logs to the list of filed reports. In order to most accurately count clicks made by actual end users of our website, we removed clicks made by Ethics Board staff members from their office computers and clicks from IP-addresses that were identified as probable automated data aggregators.

Due to a server upgrade in 2022, the web server logs for 2022 begin in June. As such, the data for 2022 is reported for those reports filed and viewed between July 1, 2022 and December 31, 2022. The 2023 data covers the full calendar year.

For the 2022 and 2023 election cycles, Any/Other Office Candidates could potentially file the following report types: Annual Reports for future elections, Supplemental Reports for past elections, 30th Day Prior to Primary Reports, 10th Day Prior to Primary Reports, 10th Day Prior to General Reports, and 40th Day After General Reports. In order to have a point of comparison for the frequency of engagement for these reports filed by Any/Other Candidates, we pulled information for Major and District level candidates as well. Since Major and District level candidates are all required to electronically file their reports, we list the results for all Any/Other Office Candidates as well as showing the subsets for those reports filed on paper and those filed electronically.

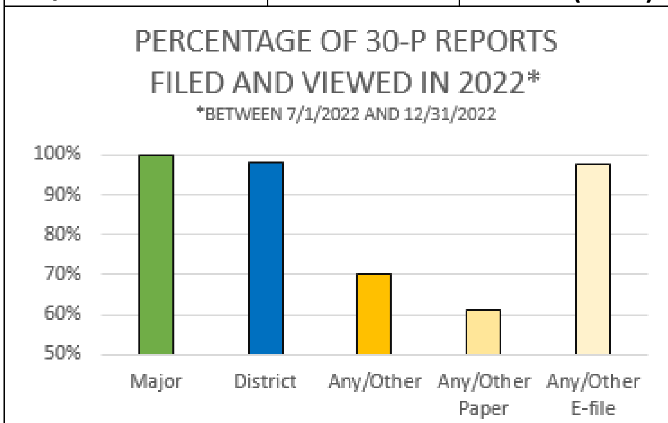
For each of the listed report types, the following questions are answered for all filers together and for Major, District, and Any/Other candidates separately. The results regarding Any/Other Candidates are highlighted in bold, since those were the figures specifically requested.

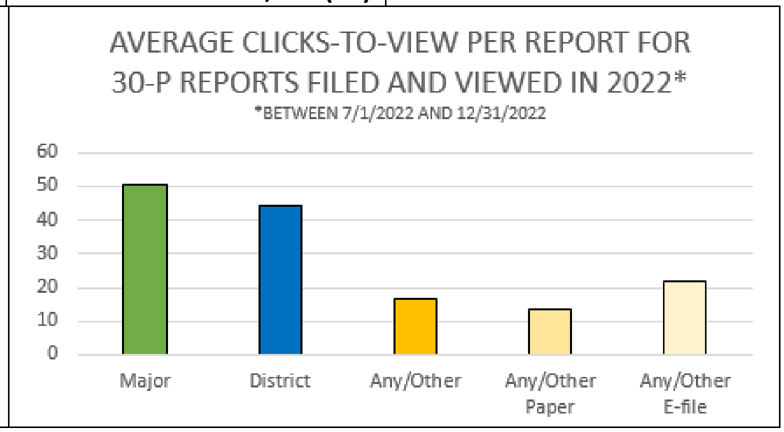
1. How many of these reports were filed in 2022 and 2023?
   - For reports filed on paper, the date filed is based on the date that the report was originally filed, i.e., date faxed, uploaded, hand delivered, or postmarked. Paper filed original and amended reports are counted as a single report since they are physically processed together.
   - For electronically filed reports, the date filed is based on the date each individual report was submitted. Electronically filed original and amended reports are counted as separate reports since they are each submitted as full reports.
2. Of those reports filed, how many were viewed in 2022 and 2023?
   - For each year, the number of reports that were filed and viewed in that year is listed as well as what percentage that number represents of all reports filed in that year.
3. Of reports filed, how many total clicks-to-view were there in 2022 and 2023?
   - The overall number of clicks-to-view reports that were filed within the particular year is listed as well as the average number of clicks-to-view per report viewed.

After each dataset, there are two bar graphs that show the relative percentage of filed reports viewed as well as the average clicks-to-view per report for the different types of filers.

30th Day Prior to Primary Reports Filed in 2022 (between 7/1/2022 and 12/31/2022)

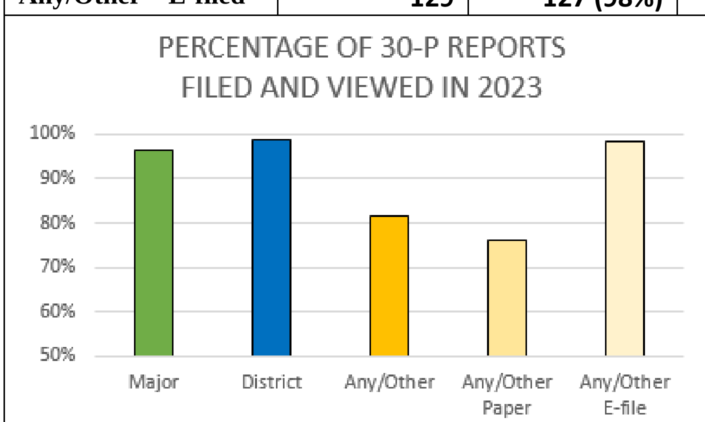
	How may 30-P reports were filed in 2022?	Of reports filed, how many were viewed in 2022? (% viewed)	Of reports filed, how many total clicks-to-view were there in 2022? (Ave. views per report)
All Candidates	1,055	794 (75%)	18,613 (23)
Major	42	42 (100%)	2,127 (51)
District	151	148 (98%)	6,557 (44)
Any/Other	**862**	**604 (70%)**	**9,929 (16)**
Any/Other – Paper	**651**	**398 (61%)**	**5,398 (14)**
Any/Other – E-filed	**211**	**206 (98%)**	**4,531 (22)**

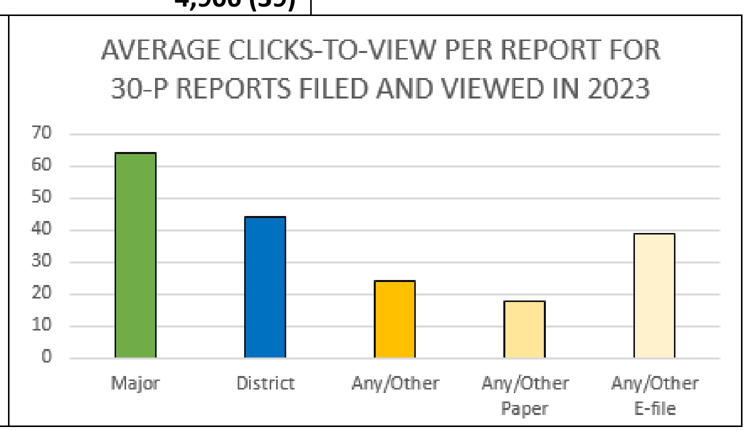




30th Day Prior to Primary Reports Filed in 2023 (between 1/1/2023 and 12/31/2023)

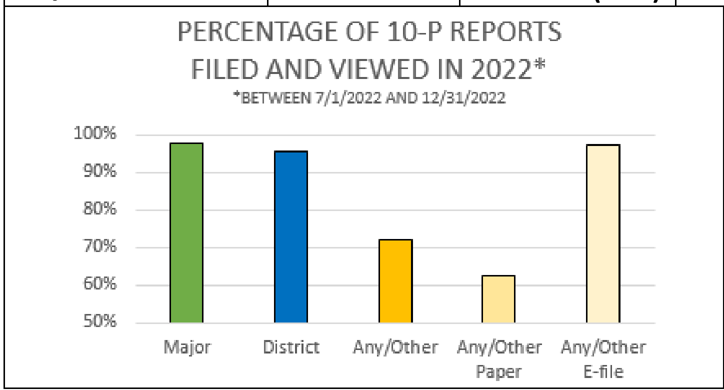
	How may 30-P reports were filed in 2023?	Of reports filed, how many were viewed in 2023? (% viewed)	Of reports filed, how many total clicks-to-view were there in 2023? (Ave. views per report)
All Candidates	1,743	1,624 (93%)	65,844 (41)
Major	160	154 (96%)	9,900 (64)
District	1,051	1,036 (99%)	45,498 (44)
Any/Other	**532**	**434 (82%)**	**10,446 (24)**
Any/Other – Paper	**403**	**307 (76%)**	**5,540 (18)**
Any/Other – E-filed	**129**	**127 (98%)**	**4,906 (39)**

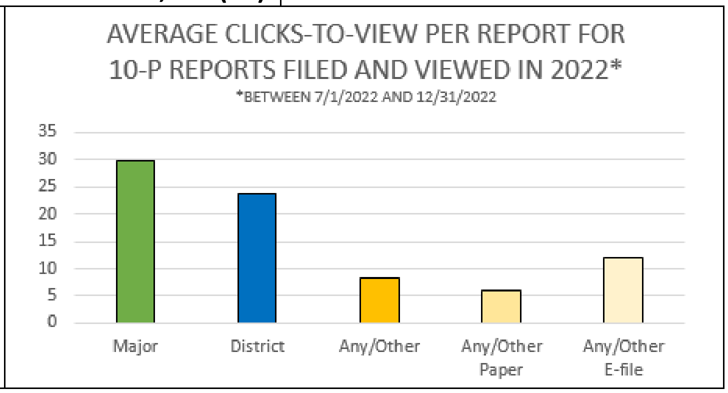




10th Day Prior to Primary Reports Filed in 2022 (between 7/1/2022 and 12/31/2022)

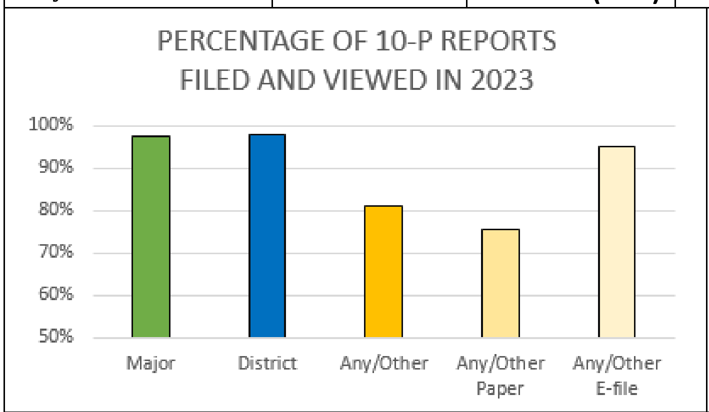
	How may 10-P reports were filed in 2022?	Of reports filed, how many were viewed in 2022? (% viewed)	Of reports filed, how many total clicks-to-view were there in 2022? (Ave. views per report)
All Candidates	785	604 (77%)	7,543 (12)
Major	41	40 (98%)	1,193 (30)
District	116	111 (96%)	2,635 (24)
Any/Other	**628**	**453 (72%)**	**3,715 (8)**
Any/Other – Paper	**455**	**285 (63%)**	**1,694 (6)**
Any/Other – E-filed	**173**	**168 (97%)**	**2,021 (12)**

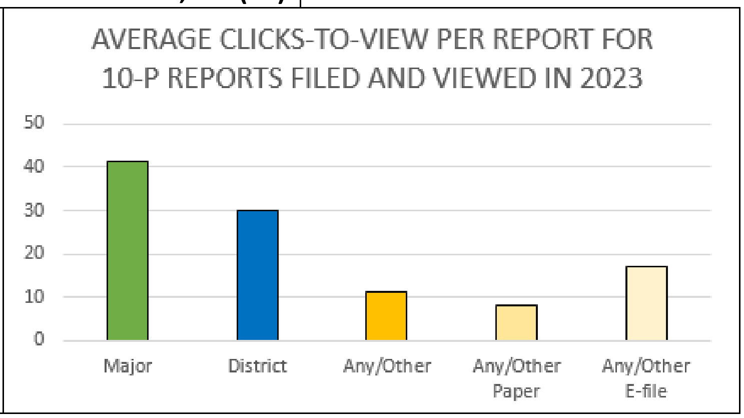




10th Day Prior to Primary Reports Filed in 2023 (between 1/1/2023 and 12/31/2023)

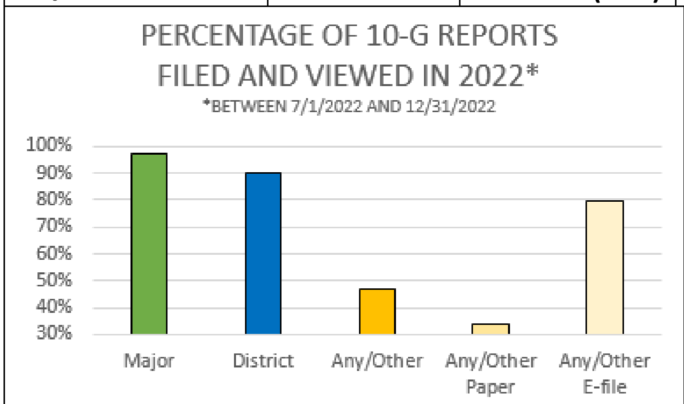
	How may 10-P reports were filed in 2023?	Of reports filed, how many were viewed in 2023? (% viewed)	Of reports filed, how many total clicks-to-view were there in 2023? (Ave. views per report)
All Candidates	1,218	1,119 (92%)	28,231 (25)
Major	116	113 (97%)	4,680 (41)
District	668	654 (98%)	19,646 (30)
Any/Other	**434**	**352 (81%)**	**3,905 (11)**
Any/Other – Paper	**312**	**236 (76%)**	**1,929 (8)**
Any/Other – E-filed	**122**	**116 (95%)**	**1,976 (17)**

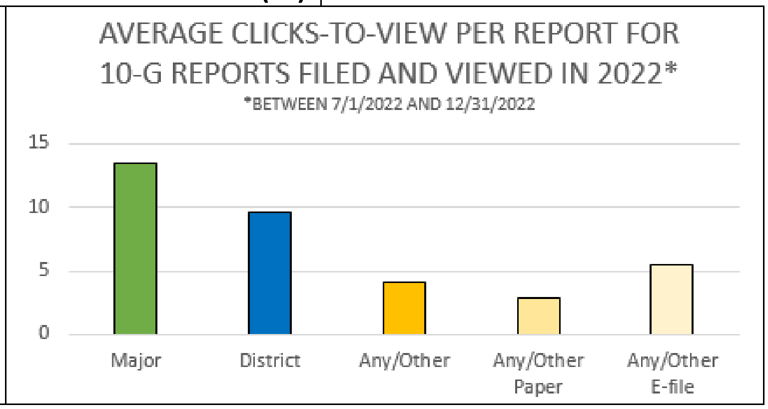




10th Day Prior to General Reports Filed in 2022 (between 7/1/2022 and 12/31/2022)

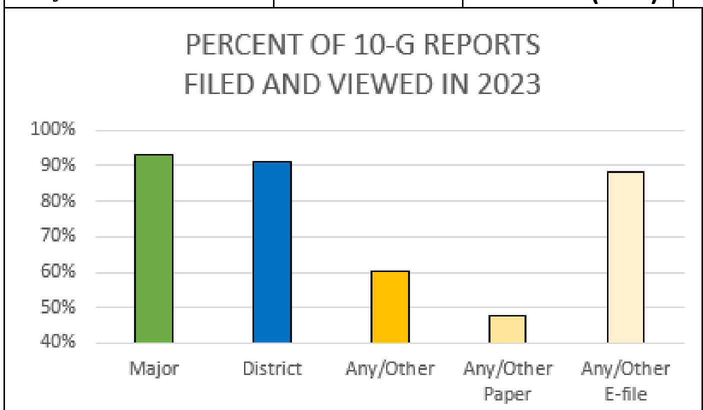
	How may 10-G reports were filed in 2022?	Of reports filed, how many were viewed in 2022? (% viewed)	Of reports filed, how many total clicks-to-view were there in 2022? (Ave. views per report)
All Candidates	738	410 (56%)	2,523 (6)
Major	34	33 (97%)	442 (13)
District	108	97 (90%)	926 (10)
Any/Other	**596**	**280 (47%)**	**1,155 (4)**
Any/Other – Paper	**425**	**144 (34%)**	**415 (3)**
Any/Other – E-filed	**171**	**136 (80%)**	**740 (5)**

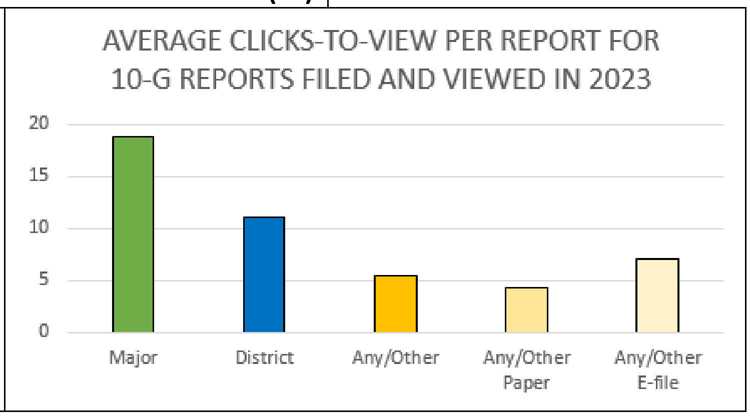




10th Day Prior to General Reports Filed in 2023 (between 1/1/2023 and 12/31/2023)

	How may 10-G reports were filed in 2023?	Of reports filed, how many were viewed in 2023? (% viewed)	Of reports filed, how many total clicks-to-view were there in 2023? (Ave. views per report)
All Candidates	1,189	956 (80%)	9,945 (10)
Major	99	92 (93%)	1,728 (19)
District	674	614 (91%)	6,833 (11)
Any/Other	**416**	**250 (60%)**	**1,384 (6)**
Any/Other – Paper	**288**	**137 (48%)**	**591 (4)**
Any/Other – E-filed	**128**	**113 (88%)**	**793 (7)**

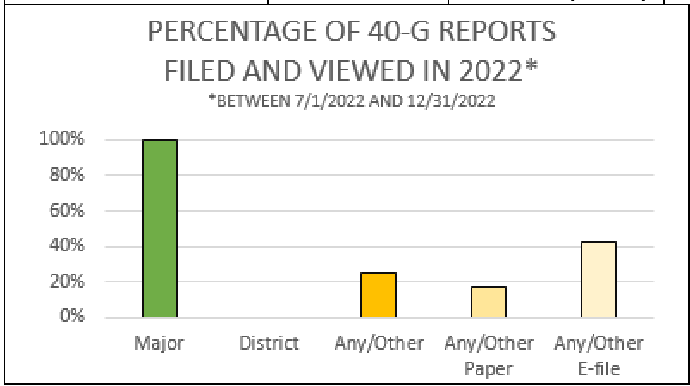


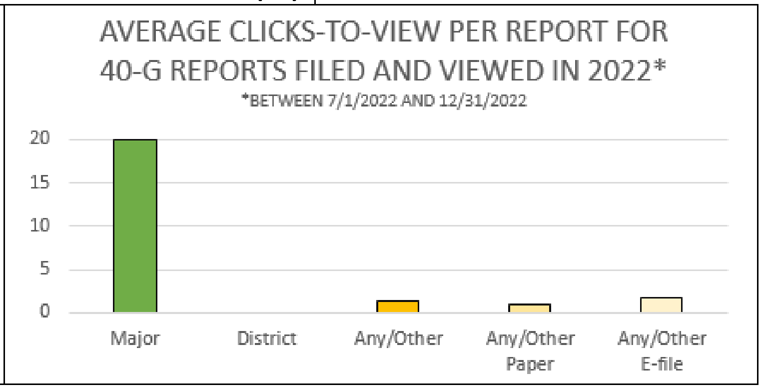


40th Day After General Reports Filed in 2022 (between 7/1/2022 and 12/31/2022)

The 40-G for the November 2022 election was due on January 19, 2023. The reports listed in the table below were either filed early or were amendments to 40-G's from past elections.

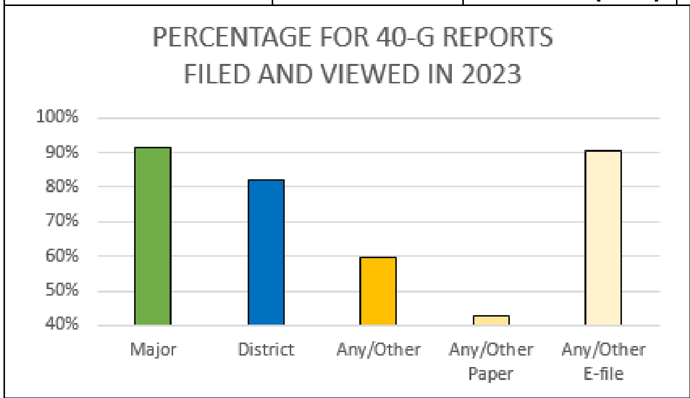
	How may 40-G reports were filed in 2022?	Of reports filed, how many were viewed in 2022? (% viewed)	Of reports filed, how many total clicks-to-view were there in 2022? (Ave. views per report)
All Candidates	29	8 (28%)	48 (6)
Major	2	2 (100%)	40 (20)
District	3	0 (0%)	0 (0)
Any/Other	**24**	**6 (25%)**	**8 (1)**
Any/Other – Paper	**17**	**3 (18%)**	**3 (1)**
Any/Other – E-filed	**7**	**3 (43%)**	**5 (2)**

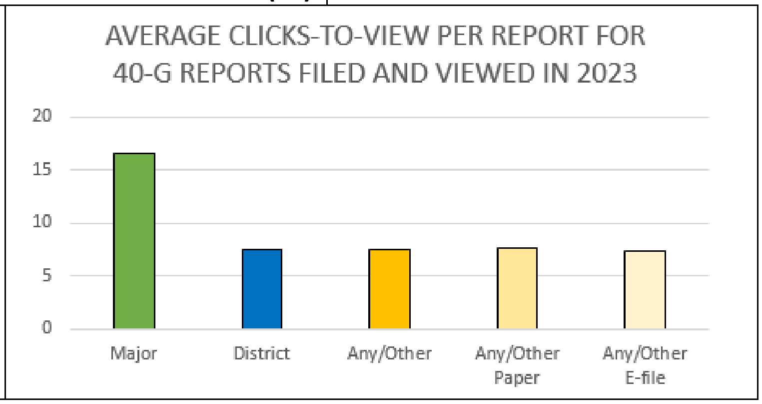




40th Day After General Reports Filed in 2023 (between 1/1/2023 and 12/31/2023)

	How may 40-G reports were filed in 2023?	Of reports filed, how many were viewed in 2023? (% viewed)	Of reports filed, how many total clicks-to-view were there in 2023? (Ave. views per report)
All Candidates	338	241 (71%)	1,998 (8)
Major	23	21 (91%)	349 (17)
District	141	116 (82%)	867 (7)
Any/Other	**174**	**104 (60%)**	**782 (8)**
Any/Other – Paper	**112**	**48 (43%)**	**366 (8)**
Any/Other – E-filed	**62**	**56 (90%)**	**416 (7)**

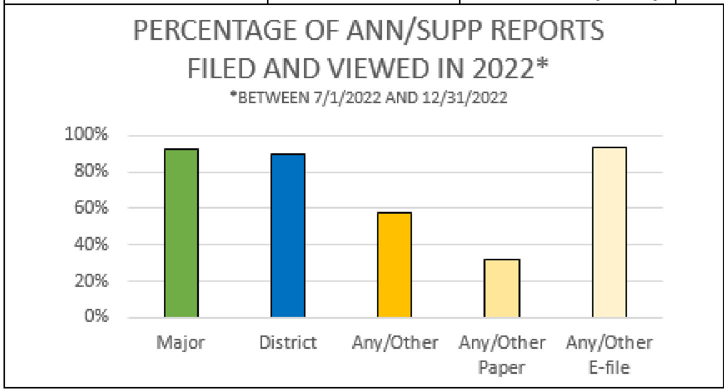


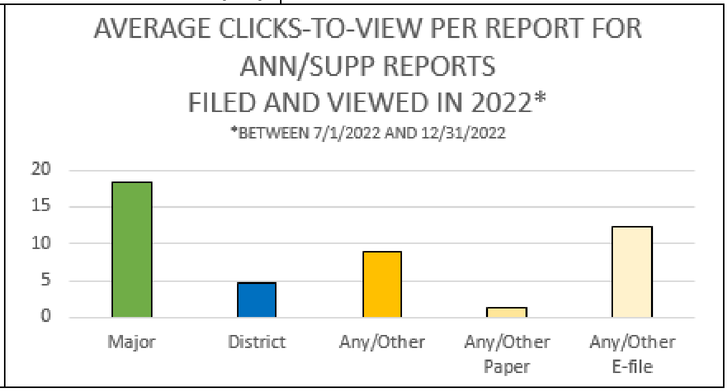


Annual/Supplemental Reports Filed in 2022 (between 7/1/2022 and 12/31/2022)

Annual and Supplemental Reports are due by February 15th of each calendar year. The Annual and Supplemental Reports in the table below are either late filers, amendments to prior reports, or reports filed early to close accounts.

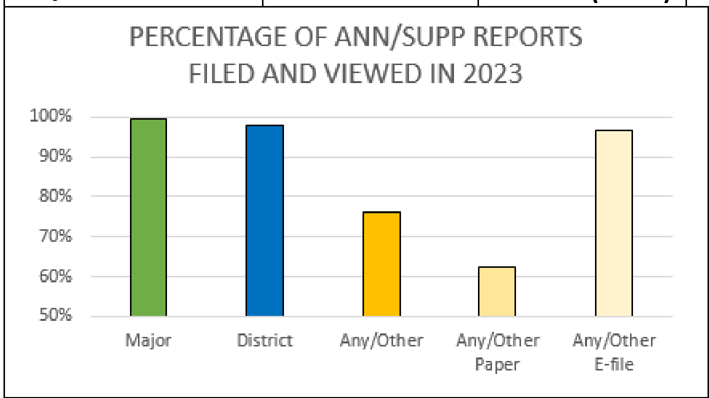
	How may ANN/SUPP reports were filed in 2022?	Of reports filed, how many were viewed in 2022? (% viewed)	Of reports filed, how many total clicks-to-view were there in 2022? (Ave. views per report)
All Candidates	101	79 (78%)	639 (8)
Major	14	13 (93%)	237 (18)
District	49	44 (90%)	207 (5)
Any/Other	**38**	**22 (58%)**	**195 (9)**
Any/Other – Paper	**22**	**7 (32%)**	**9 (1)**
Any/Other – E-filed	**16**	**15 (94%)**	**186 (12)**

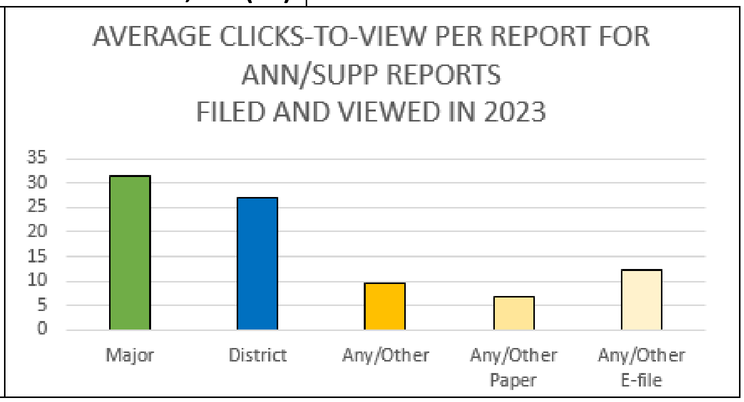




Annual/Supplemental Reports Filed in 2023 (between 1/1/2023 and 12/31/2023)

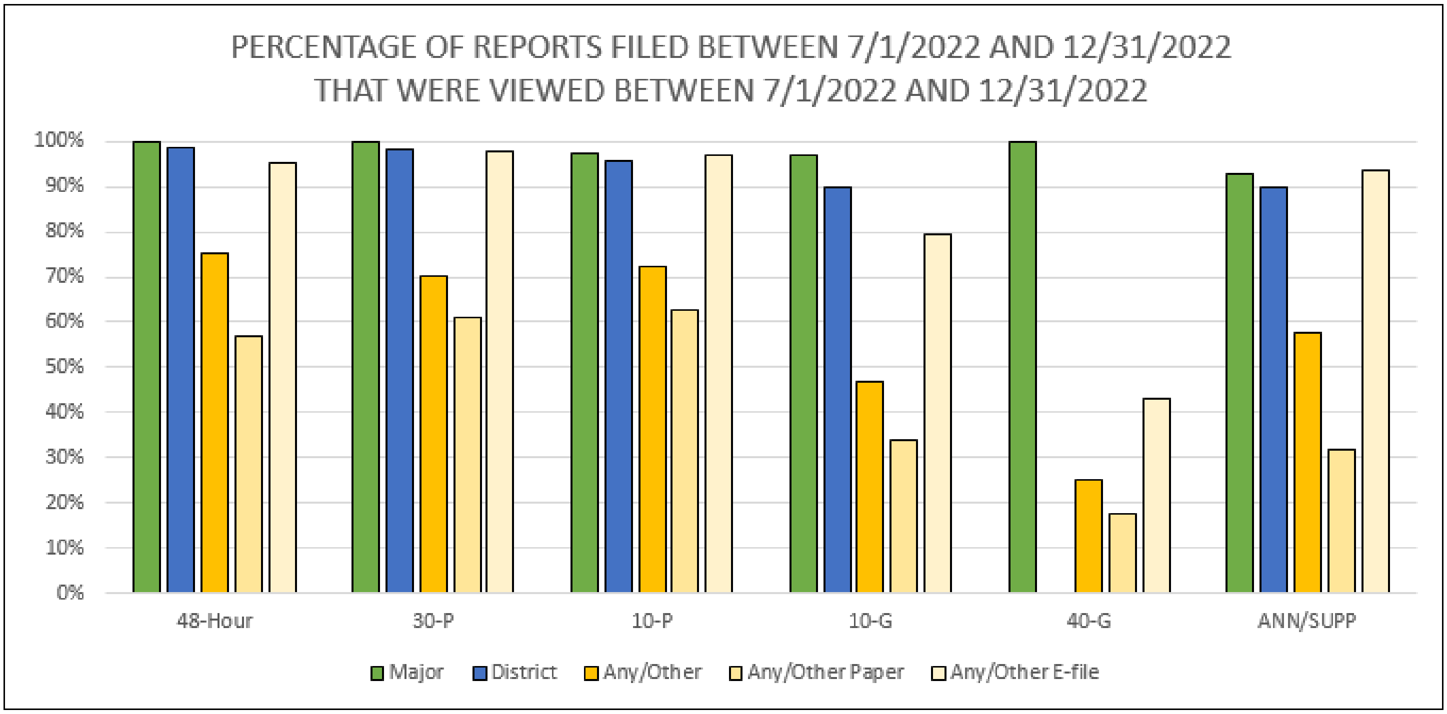
	How may ANN/SUPP reports were filed in 2023?	Of reports filed, how many were viewed in 2023? (% viewed)	Of reports filed, how many total clicks-to-view were there in 2023? (Ave. views per report)
All Candidates	2,496	2,311 (93%)	56,013 (24)
Major	489	487 (100%)	15,233 (31)
District	1,362	1,332 (98%)	36,012 (27)
Any/Other	**645**	**492 (76%)**	**4,768 (10)**
Any/Other – Paper	**382**	**238 (62%)**	**1,614 (7)**
Any/Other – E-filed	**263**	**254 (97%)**	**3,154 (12)**

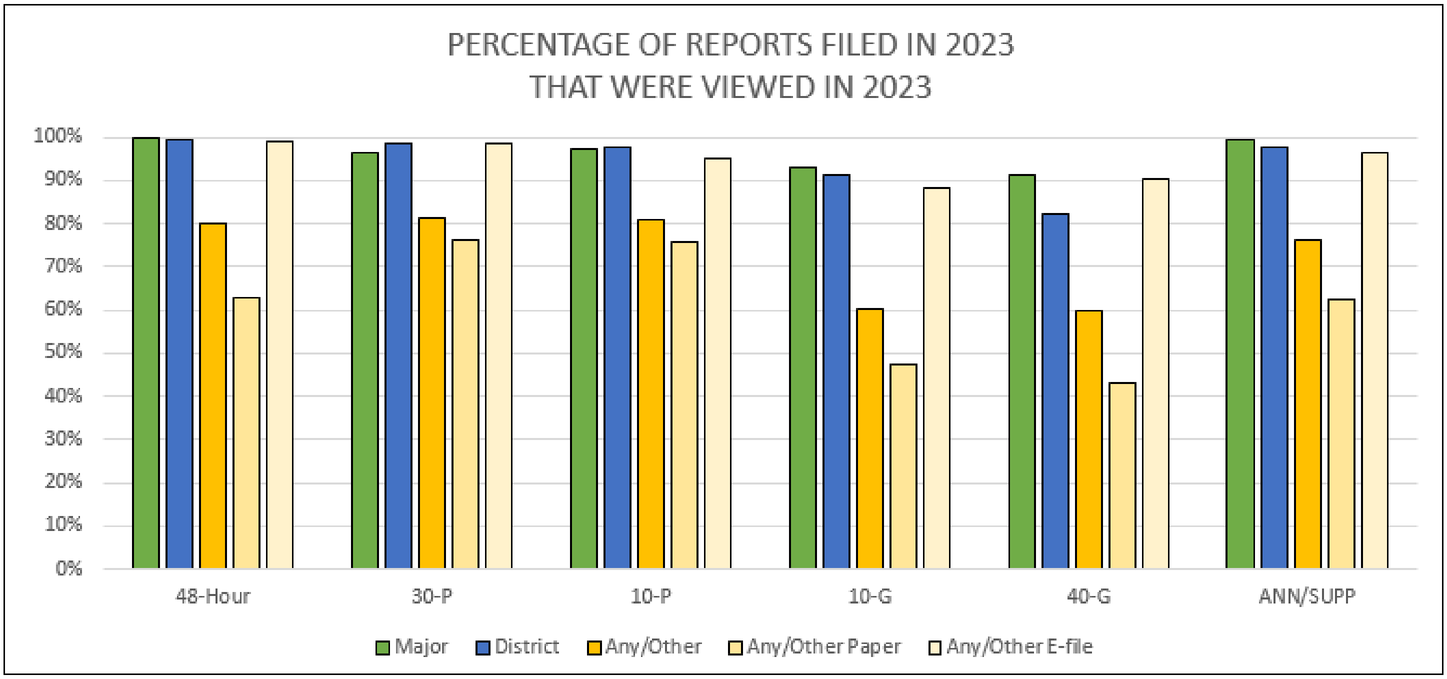




Comparing the Percentage of Reports Filed and Viewed across All Report Types Studied

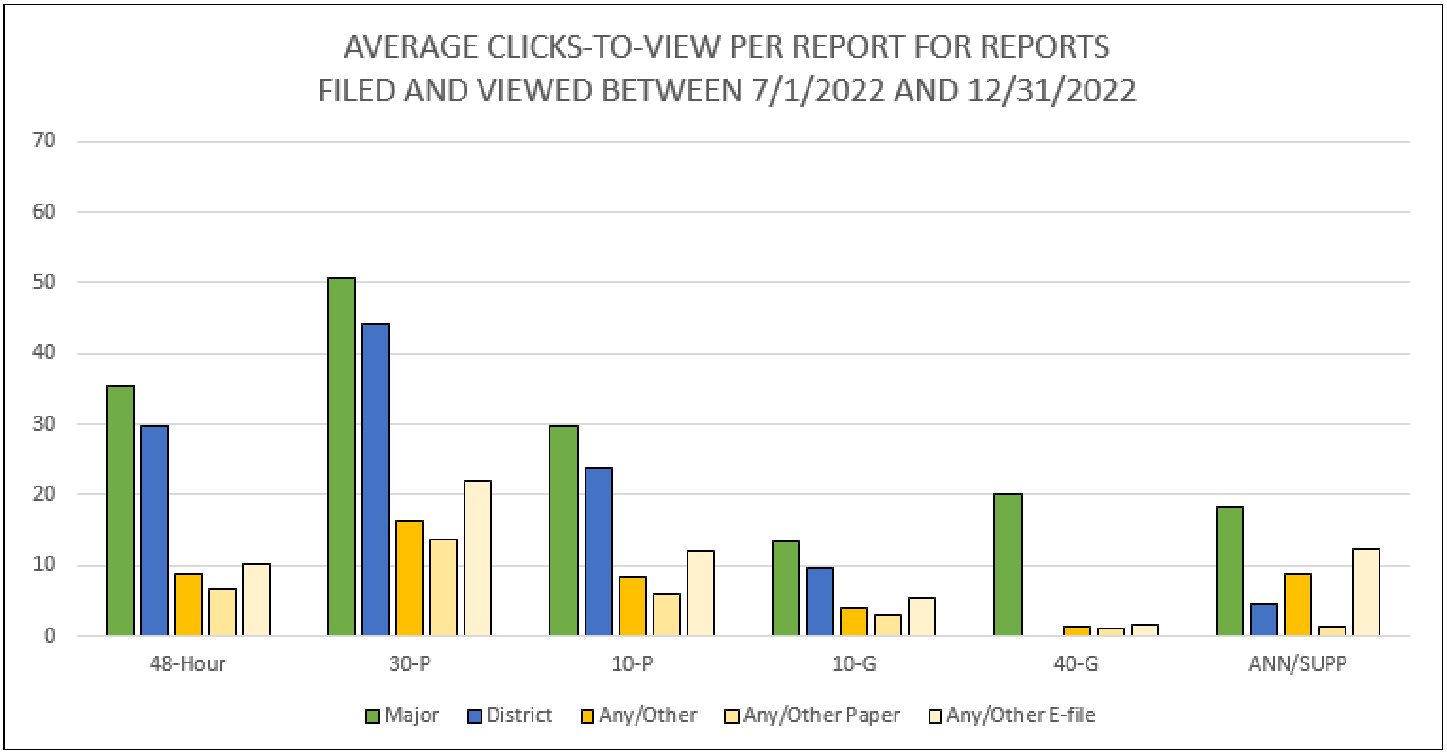
The following two charts illustrate the percentage of reports filed in a particular year that also had at least one click-to-view during that same year. These charts use the data found on prior pages of this report in order to make it easier to compare the data across both candidate filer types and the report types filed.

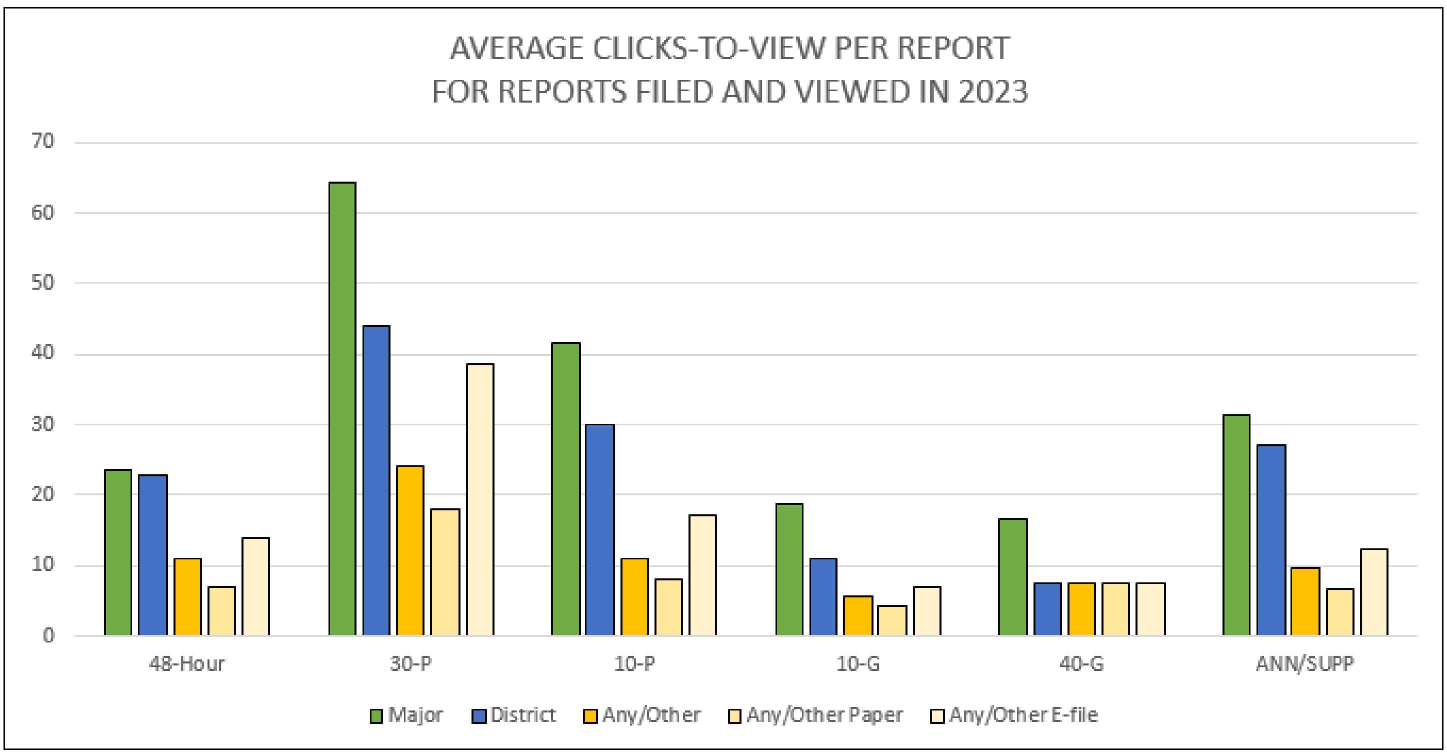




Comparing the Average Clicks-to-View per Report across All Report Types Studied

The following two charts illustrate the clicks-to-view per report for each report viewed in a particular year. These charts use the data found on prior pages of this report in order to make it easier to compare the data across both candidate filer types and the report types filed.





Louisiana Board of Ethics

Appendix C

Campaign Finance and Disclosure
Systems Best Practices

Appendix C – Online Campaign Finance and Disclosure Electronic Filing Systems Survey Given to State Agencies

Louisiana Board of Ethics: Campaign Finance and Disclosure electronic filing systems survey

The purpose of this study is to research the best practices for electronic filing systems for Campaign Finance and Disclosure reporting at the directive of the Louisiana Legislature pursuant to Act 664 of the 2024 Regular Legislative Session.

* Required

Information About your Agency/Organization

1. Name of your Organization/Agency (Please include the full name of your Agency/Organization) *

Enter your answer

2. Disciplines *

If check Other, please provide an explanation in available text field

- ☐ Campaign Finance
- ☐ Elections
- ☐ Ethics
- ☐ Freedom of Information
- ☐ Lobbying
- ☐ Other

3. Name/Title of Person (First and Last Name) responding to this survey *

4. Contact Person's Email Address *

5. How many employees are in your agency's IT department? *

Electronic Filing System Questions

6. Does your agency have electronic filing for the following: (Please check all that apply) *

If check Other, please provide an explanation in available text field

- ☐ Campaign Finance
- ☐ Personal Financial
- ☐ Lobbying
- ☐ Political Action Committee
- ☐ Independent expenditure Committee
- ☐ No, we do not offer e-filing systems
- ☐ Other

7. Are filers required to electronically file their reports *

If check Other, please provide an explanation in available text field

- ○ All filers are required to file electronically
- ○ Some filers are required to file electronically
- ○ E-filing is not mandatory
- ○ Other

8. How many users does your system support?

The value must be a number

9. Did your agency outsource the development of its electronic filing system?

- ◯ Yes
- ◯ No

Vendor information

If you answered Yes in the question 7, please provide the information below regarding your vendor

10. What is the name of the company that developed the system?

11. What was the cost of the development?

12. How long did the company take to develop the system?

13. Does your agency maintain the system?

- ◯ Yes
- ◯ No
- ◯ Other

14. If your agency maintains the system, how many employees are responsible for maintaining the system, and is it their sole responsibility?

15. If your Agency does not maintain the system, what is the annual cost to maintain the system?

16. Does your vendor provide technical support for users?

- Yes
- No
- Other

Information regarding your Agency IT Department

17. How many employees were dedicated to the development of your agency's e-filing system for the purposes of submitting campaign finance and disclosure reports and developing a public web portal for viewing the submitted data?

18. How long did it take to develop your agency's e-filing system and public web portal?

19. Do you have dedicated staff to maintain and provide technical support? If Yes, indicate below how many.

20. If you do not have dedicated staff to maintain and provide technical support, please indicate below who provides such service.

Information about your filing system

21. If your system **allows** for a person to file reports for multiple filers using a single login, how does the filer certify the accuracy of the reports?

22. If your system **does not** allow for a person to file reports for multiple filers using a single login, does your system allow for the filer to share login information with their preparer? If yes, how does the filer certify the accuracy of their reports?

23. Does your electronic filing system support any of the features below? (Check all that apply.)

- [ ] System allows the filer to track deadlines.
- [ ] System sends emails, reminders regarding deadlines.
- [ ] System allows real-time calculations of total contributions, expenditures and debts for a specific election
- [ ] System supports a contributions import feature from filer's accounting software
- [ ] System supports submission of electronic data from third-party software
- [ ] System provides for the integration of application programming interface ("API") technology at all levels of campaign filing
- [ ] System automatically generates data models and maps

24. Please share any additional features about your system that are not listed in response to the previous question

General Campaign Finance Questions

Please answer the following questions if you selected Campaign Finance as your discipline

25. How frequently are campaign finance reports filed?
    If check Other, please provide an explanation in available text field

- ☐ Monthly basis
- ☐ Quarterly bases
- ☐ Based on an election cycle
- ☐ Other

26. If campaign finance reports are filed based on an election cycle, please share the names of the reports that are filed. If it would be easier, you can share your reporting and filing schedule that you give to candidates, provide the link to the schedule or email it to IT Director, Slava Sereda at slava.sereda@la.gov

27. Does your jurisdiction allow a candidate to designate an excess contribution received from a contributor from one election to another election?

- ○ Yes
- ○ No
- ○ Other

28. Does your jurisdiction allow a candidate to attribute a portion of their contribution to another contributor?
    If check Other, please provide an explanation in available text field

- ○ Yes
- ○ No
- ○ Other

29. If you answered "Yes", please provide a statutory reference:

Thank you for participating in our survey!

Louisiana Board of Ethics

Appendix D

Campaign Finance and Disclosure Systems Best Practices

Appendix D – Online Campaign Finance and Disclosure Electronic Filing Systems Survey Given to Current Users of LEADERS

Features for improving the Louisiana Electronic Filing System

Per Act No. 664 of the 2024 Regular Session, the Louisiana Board of Ethics has been directed to conduct an analysis of best practices that could be implemented to modernize Louisiana's campaign finance and disclosure system. As part of that study, the Board is interested in receiving feedback from current users of the following e-filing systems: Leaders Online for filing Campaign Finance Reports, Leaders PDP for filing Campaign Finance Reports that were prepared using third party software, and PFD E-file for filing Personal Financial Disclosures. Since you are listed as an authorized preparer for multiple individuals or entities that use at least one of these e-filing systems, the Board is requesting that you respond to the following survey by November 1, 2024.

Introductory question:

1. Which e-filing systems have you used to submit reports to the Louisiana Board of Ethics? *

- [ ] Leaders Online for filing Campaign Finance Reports
- [ ] Leaders PDP for uploading pdp data files for Campaign Finance Reports that were prepared using third party software
- [ ] PFD E-file for filing Personal Financial Disclosure Reports

Rating Questions

Please only rate the systems that you have experience with. Use the space below the star ratings if you would like to give an explanation for your rating.

With regard to Leaders Online

2. How would you rate your overall satisfaction with your experience?

☆ ☆ ☆ ☆ ☆

3. How would you rate the overall ease of use?

☆ ☆ ☆ ☆ ☆

4. How would you rate the report creation process?

☆ ☆ ☆ ☆ ☆

5. How would you rate the data entry aspect?

☆ ☆ ☆ ☆ ☆

6. How would you rate the submission process?

☆ ☆ ☆ ☆ ☆

7. Please use the space below if you would like to give an explanation for your ratings (optional).

With regard to Leaders PDP (uploads from third party vendor systems)

8. How would you rate your overall satisfaction with your experience?

☆ ☆ ☆ ☆ ☆

9. How would you rate the file validation process?

☆ ☆ ☆ ☆ ☆

10. How would you rate the submission process?

☆ ☆ ☆ ☆ ☆

11. Please use the space below if you would like to give an explanation for your ratings (optional).

With regard to PFD E-file (Personal Financial Disclosure online system)

12. How would you rate your overall satisfaction with your experience?

☆ ☆ ☆ ☆ ☆

13. How would you rate the overall ease of use?

☆ ☆ ☆ ☆ ☆

14. How would you rate the report creation process?

☆ ☆ ☆ ☆ ☆

15. How would you rate the data entry aspect?

☆ ☆ ☆ ☆ ☆

16. How would you rate the submission process?

☆ ☆ ☆ ☆ ☆

17. Please use the space below if you would like to give an explanation for your ratings (optional).

If you have ever contacted the Louisiana Board of Ethics staff for assistance with e-filing

Please rate the following:

18. The speed at which you were able to speak with a staff member

☆ ☆ ☆ ☆ ☆

19. The ability of the staff member to accurately respond to your questions or issues

☆ ☆ ☆ ☆ ☆

20. The professionalism of the staff member

☆ ☆ ☆ ☆ ☆

21. Overall satisfaction with the interaction

☆ ☆ ☆ ☆ ☆

22. Please use the space below if you would like to give an explanation for your ratings (optional).

23. Please list up to five features that you would like to see added to the Leaders Online or PFD E-file systems.

24. If you have any additional comments, please list them here.

25. Please indicate your name (optional)