

*Reports Analysis Division
(RAD)
Review Process*



RAD Mission Statement

The ultimate mission of the Reports Analysis Division (RAD) is to ensure that campaigns and political committees file timely and accurate reports that fully disclose their financial activities. RAD is responsible for reviewing statements and financial reports filed by political committees participating in Federal elections, providing assistance and guidance to the committees to properly file their reports, and for taking appropriate action to ensure compliance with the FECA. By enforcing the rules in a fair and objective manner, RAD fosters the electorate's faith in the ultimate integrity of the nation's political process.



Organization of RAD

4 Branches

- **Party Non-Party Branch – 24 analysts**
 - ▶ **Review all Party and PAC reports**
 - ▶ **4-5 Month training program and mentored for 6-12 months**
- **Authorized Branch – 17 analysts**
 - ▶ **Review all federal candidate committee reports**
 - ▶ **2 Month training program and mentored for 6-12 months**
- **Compliance Branch – 4 analysts**
 - ▶ **Implement the non-filer and Administrative Fine programs**
- **Reports Processing Branch – 14 team members**
 - ▶ **Prepare incoming FEC paper reports for scanning**
 - ▶ **Handle the coding process to ensure that itemized transactions are properly entered and categorized in the FEC database**

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A. Organization of RAD

1. Four Branches

- a) Party/NonParty Branch – review all party committees and PAC reports – 24 analysts. New analysts undergo a 4-5 month training process and are then mentored by a more Senior analyst for 6 to 12 months.
- b) Authorized Branch – review federal candidate committees reports – 17 analysts. New analysts undergo a 2 month training process and are then mentored by a more Senior analyst for 6 to 12 months.
- c) Compliance Branch – serve a quality control function for the review branches and implement the non-filer and Administrative Fine programs – 4 analysts
- d) Reports Processing Branch - Prepare incoming FEC paper reports for scanning, and handle the coding process to ensure that itemized transactions are properly entered and categorized in the FEC database. 14 team members.



PAC/Party Analysts

- Each analyst is assigned 400-500 committees
- PACs with are assigned randomly
- Larger PACs assigned to more senior analysts
- National committees assigned to more senior analysts, State party committees assigned by state, Local parties assigned randomly

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2. **Committee Assignments – Party/Non-Party Branch**
 - a) Party/NonParty Branch analysts are assigned anywhere from 400 to 500 committees (parties and PACs).
 - b) PACs are assigned randomly with the larger ones being assigned to more senior analysts.
 - c) National Committees are assigned to the more Senior analysts, State Party committees are assigned by state, so that the assigned analyst reviews both the Democratic and Republican state parties, Local parties are assigned randomly.



Authorized Branch Analysts

- Each analyst is assigned 250-400 committees
- House and Senate campaigns assigned by state
- Presidential and Delegate committees are assigned to senior analysts
- All others are assigned at random

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3. **Committee Assignments – Authorized Branch**

- a) Authorized Branch analysts are assigned anywhere from 250 to 400 committees (House, Senate, Presidential, Delegate, Joint Fundraising committees, Independent Expenditure filers that are not political committees and Electioneering Communication filers).
- b) House and Senate Campaign committees are assigned by state
- c) Presidential and Delegate committees are assigned to more senior analysts.
- d) All others are assigned randomly.



Analyst Responsibilities

- Review assigned committees' reports by established deadlines
- Assist committees by phone and log calls
- Meet with committees by request
- Participate in FEC webinars
- Special projects

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- 4. Analyst Responsibilities**
 - a) Review all reports filed by assigned committees by established deadlines.
 - b) Customer service role – assist committees on the phone on a daily basis and log phone calls. Meet with Committees by request. Participate in FEC webinars.
 - c) Special Projects (e.g., YouTube tutorials and testing of FECfile software).



RAD Review & Referral Procedures

- 30 Categories of review include:
 - ▶ Mathematical Discrepancies
 - ▶ Failure to Provide Supporting Schedules
 - ▶ Failure to Properly Itemize Contributions from Individuals
- RFAI threshold
- Thresholds in Procedures are redacted
- Procedures are approved by the Commission

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B. RAD Review of Reports

1. RAD Review and Referral Procedures

- a) Internal policy contains thirty categories of review the analyst checks, such as: Mathematical Discrepancies, Failure to Provide Supporting Schedules and Failure to Properly Itemize Contributions from Individuals, to name a few.
- b) Procedures have established thresholds for making determination on whether to send a **Request for Additional Information** (RFAI).
- c) While the Procedures are publicly available on the FEC web page (http://www.fec.gov/law/procedural_materials.shtml), the thresholds have been redacted.
- d) Procedures are approved by the Commission for every two-year election cycle.



Review of Reports

Thresholds applied on a per report basis

- Committee may receive RFAI on same issue already addressed in response to RFAI from earlier report
- Exceptions: Responses relating to best efforts procedures apply for the two year election cycle; responses relating to foreign address inquiries that indicate safe harbor guidelines are followed for **all** contributions apply for the two year election cycle

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- e) Review is conducted on a per report basis, meaning the thresholds are applied to each report reviewed.
 - 1) This means a committee may receive a RFAI which includes the same issue already addressed in response to a RFAI referencing a different report.
 - Exceptions include outlining Best Efforts procedures which would apply to the two-year cycle and responses relating to foreign address inquiries that indicate safe harbor guidelines are followed for **all** contributions apply for the two year election cycle.



Review of Reports

- Several issues may combine to meet a single threshold, so it's possible to see an issue questioned on one report, but not on another
- Commission reassesses procedures every election cycle and revises it based on input from RAD and other offices (such as OGC) and Commissioners.

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- 2) There may be several issues that are aggregated together to meet a single threshold, so it's possible to see an issue questioned on one report that isn't included in an RFAI on for another report.
- f) Procedures are reassessed every election cycle and revisions/change made based on input from RAD and other offices (such as OGC), and Commissioners.

Request for Additional Information

- ☐ If internal thresholds are met:
 - Analyst sends RFAI with response due date in upper right corner
- ☐ No extensions
- ☐ Responses assessed by analysts, team leaders
- ☐ Analysts do not reply to committee responses



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Basics & Best Practices

C. Request for Additional Information (RFAI)

1. If internal thresholds are met an RFAI is sent, with a “Response Due Date” in the upper right hand corner of the letter, extensions are not granted. The committee analyst’s name and contact telephone number are also provided in the letter.
2. **Tip:** You can find out who your analyst is by visiting: <http://www.fec.gov/rad/index.shtml>

RFAIs via Email

- ▣ RAD is now emailing RFAIs to email address on Form 1 (Statement of Organization).
 - Opt-Out Option: File a Form 99 to request that RFAIs be mailed via USPS.
- ▣ Committees can now list up to two email addresses on Form 1.
- ▣ Ensure current contact information (mailing address, email address, and phone number) appear on FEC Form 1.



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Basics & Best Practices

D. RFAI via email

1. Most RFAIs are now sent via email to the Committee's official email address, as disclosed on the Statement of Organization (FEC Form 1).
2. Up to two email addresses can now be provided (both will be used for emailing RFAIs).
3. Committees have the option to continue to receive RFAIs on paper through the mail.

Request for Additional Info

Important: Request for Additional Information from the Federal Election Commission

Federal Election Commission

May 14, 2010

Dear Treasurer/Filer:

This e-mail is being sent by the Reports Analysis Division (RAD) of the Federal Election Commission to request additional information on a report(s) or statement filed by your organization. Please note that this is an automated e-mail; any response or information should not be made via e-mail, as your response will be processed as a Request for Additional Information (RAFI), simply click [here](#).

If the above link does not work, you can access the letter by copying the address field of your browser: <http://webtest.fec.gov/fecletter/getletter.do?w=16b=333300120146c&id=631120876>

To ensure delivery, add:

Link to RAFI

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Basics & Best Practices

Request for Additional Info

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MATT WILLIAMS, TREASURER
BRYCE HARPER FOR CONGRESS
200 NATIONALS WAY - SUITE 34
POTOMAC, MD 20000

IDENTIFICATION NUMBER: C00123456

REFERENCE: October Quarterly Report (7/1/2014-9/30/14)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 1 item(s):

RQ-2

October 25, 2014

Response Due Date
November 29, 2014

Response Due Date

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Request for Additional Info

Analyst's Phone Number

Analyst's Name

not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended.

If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1106.

Sincerely,

Bradley Matheson

Bradley Matheson
Senior Campaign Finance Analyst
Reports Analysis Division

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Basics & Best Practices

Responding to RFAs

- ❑ Analysts do not contact committees in every case when a response is not sufficient
- ❑ Committee should contact its analyst before and/or after filing a response
- ❑ Analysts do not make legal conclusions
- ❑ Analysts cannot categorize your activity
- ❑ In some cases, RAD consults OGC before sending an RFAI and when assessing a committee's response

E. Responses are assessed by the analysts and in some cases, team leaders.

1. Analysts do not reply to responses.
2. Contact is not made with committees in every case when a response is not sufficient.
3. Committees are encouraged to contact their assigned analyst prior to responding if unsure about how to respond or after a response is filed to ensure an adequate response is received.
4. Keep in mind that analysts can't make legal conclusions or give guidance on a legal conclusion being made by a committee. In addition, they cannot determine what category your activity falls under (i.e., independent expenditures or coordinated party expenditures).
5. In some cases, RAD consults with OGC before sending a RFAI and when making a response assessment.

Responding to RFAs

- ▣ File amendment to:
Add, Change or Delete actual entries on
FEC report
- ▣ Use miscellaneous text submission
(Form 99) for:
Narrative responses that do not affect actual
entries within a report
(e.g., demonstrating best efforts, demonstrating safe harbor
guidelines are followed for all contributions with a foreign address)

F. Must amend report when changing information that affects actual entries on a report.

1. This would include additions, changes or deletions.

G. Miscellaneous Text Submission (Form 99)

1. Used for narrative responses that do not affect actual entries within a report. (For example: when outlining procedures for “Best Efforts” in obtaining contributor information.)



Audit Consideration Factors

- Level of financial activity
- Responses to RFAIs
 - ✓ Late or no response
 - ✓ Inadequate response
- Election Results (Authorized Committees only)
- Number of amendments filed is NOT a factor
- Number of RFAIs received is NOT a factor if responses were adequate and timely

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H. Referrals to the Audit Division

1. Factors for making referrals to the Audit Division:

- a) Level of financial activity;
- b) Responses to RFAIs:
 - (i) Late or no response.
 - (ii) Inadequate response.
- c) Election Results (Authorized committees only)

2. The number of amendments filed is not a factor.

3. The number of RFAIs is not a factor if responded to adequately and on time.



OGC & ADRO Referrals

- Procedures include referral thresholds
- RAD calls committee before referring to OGC or ADRO to explain RFAI and request response
- Adequate and timely response may prevent referral

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- I. Referrals to OGC (Office of General Counsel), ADRO (Alternative Dispute Resolution Office) and AF (Administrative Fine Program)**
 1. Internal procedures include thresholds for determining whether a matter should be referred to OGC, ADRO or AF
 2. Committee will receive a phone call from RAD prior to a referral to ADRO or OGC to explain RFAI and request a response.
 3. An adequate response is required by the timeframe given to prevent the matter from being referred.



Contact Information

- RFAIs and Non-filer notifications are sent via email. Ensure valid e-mail address is provided on Form 1. Committees may enter up to two email addresses (still have option to receive paper RFAIs).
- Ensure that committee's most current mailing address, email address and phone number appear on Statement of Organization (FEC Form 1). Often RFAIs are bounced back due to an incorrect email address or returned by the Post Office due to an incorrect mailing address.

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- J.** Committees should ensure that they have provided the most current mailing address, email address and phone number on their Statement of Organization (FEC Form 1). Often RFAIs are bounced back due to an invalid email address or returned by the Post Office due to an incorrect mailing address. RAD began sending RFAIs via e-mail in October 2011 and non-filer notifications in February 2013.

RAD FAQs Web Page - <http://www.fec.gov/rad>

FEDERAL ELECTION COMMISSION

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Reports Analysis Division

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REPORTS ANALYSIS DIVISION MISSION STATEMENT

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The Reports Analysis Division is composed of 38 analysts tasked with reviewing approximately 50,000 financial reports per year. Each analyst is assigned 200-400 committees and is available to assist committee representatives over the phone on a daily basis. The division assists committee officials in complying with reporting requirements and conducts detailed examinations of the campaign finance reports filed by political committees. RAD also implements the non-filer and administrative fine programs. For more information, see our [Description of the RAD Exam Process](#) (pdf).

[Helpful Links to General Questions:](#)

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Basics & Best Practices

RAD Contact Numbers
202-694-1130 or 1-800-424-9530 (press 5)

We encourage you to call your Campaign Finance Analyst for assistance.

We are here to help!

