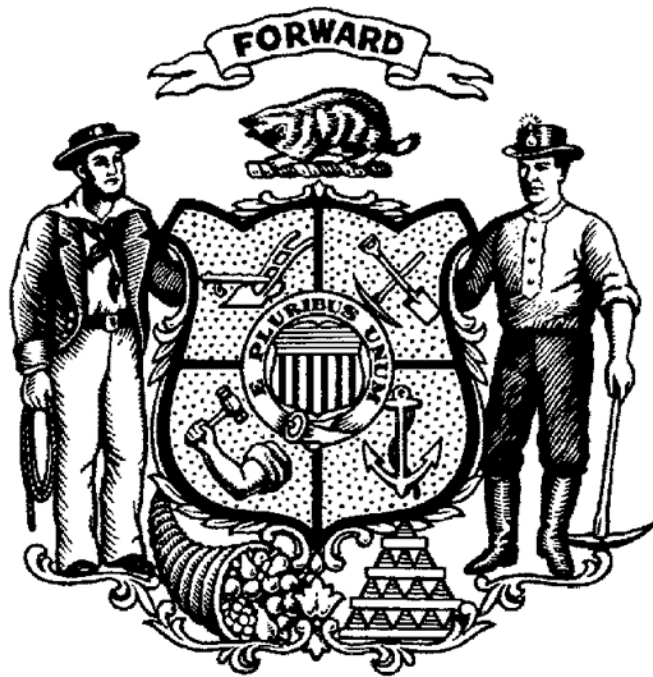


# State of Wisconsin

## Ethics Commission



Agency Budget Request

2025 – 2027 Biennium

September 16, 2024

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# Wisconsin Ethics Commission

Campaign Finance | Lobbying | Ethics  
101 East Wilson Street | Suite 127 | P.O. Box 7125 | Madison, WI 53707-7125  
(608) 266-8123 | [ethics@wi.gov](mailto:ethics@wi.gov) | <https://ethics.wi.gov>

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September 16, 2024

Kathy Blumenfeld, Secretary  
Wisconsin Department of Administration  
101 E. Wilson St., 10<sup>th</sup> Floor  
Madison, WI 53703

Dear Secretary Blumenfeld,

On behalf of the Wisconsin Ethics Commission, I am pleased to submit the agency's biennial budget request for fiscal years 2025 – 27 for your review. The Commission's budget request complies with all provided instructions, including requirements of 2015 Wisconsin Act 201 and 2017 Wisconsin Act 212.

In preparing the Commission's biennial budget request, we completed a thorough review of the previous biennial budget, as well as the Commission's statutory responsibilities, in order to determine the resources required to operate and to promote and strengthen the faith and confidence of the people of Wisconsin in their government.

We are also taking a fresh look at all programs and practices in order to identify ways to become more effective, efficient, provide the highest quality of service possible while responsibly conserving available resources, and to utilize program revenue to advance our mission.

Thank you for your consideration of the Ethics Commission's biennial budget request. The Commission and its staff look forward to working with you and the State Budget Office throughout the budget process.

Sincerely,

Daniel A. Carlton, Jr.  
Commission Administrator  
Wisconsin Ethics Commission

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*Wisconsin Ethics Commissioners*

Carousel Bayrd | Pat Strachota | Maryann Sumi | Paul Higginbotham | Gerald Ptacek | Andrew Weininger

*Administrator*

Daniel A. Carlton, Jr.

## **AGENCY DESCRIPTION**

The Commission is comprised of six members, who serve for five-year terms. One member is appointed by the Senate Majority Leader; one is appointed by the Senate Minority Leader; one is appointed by the Speaker of the Assembly; one is appointed by the Assembly Minority Leader; and two are individuals who formerly served as judges for a court of record in this state, who were elected to the positions in which they served, and who are nominated by the Governor with the advice and consent of a majority of the members of the Senate. The transition plan from the Government Accountability Board to the Commission put forth by the Department of Administration established a rotational term schedule of the Commissioners. The Commission elects a chair and vice-chair from its members by a majority vote.

The Administrator serves as the agency head and is responsible for the daily operations of the Commission. The Commission staff is nonpartisan. The Commission administers and enforces Wisconsin's campaign finance, lobbying and ethics laws.

Commission activities are arranged by five general functions: general administration; assistance to state public officials, candidates, lobbyists, principals, political committees and officeholders; assistance to local governments; education and training; and enforcement. Within these functional areas, the commission develops policy, issues formal and informal opinions, promulgates administrative rules, prescribes procedures and forms, audits disclosure reports, carries out investigations, conducts hearings and reviews appeals, brings civil actions to assess forfeitures, and addresses other related activities.

## **MISSION**

The mission of the Commission is to promote and strengthen the faith and confidence of the people of Wisconsin in their government; support the operation of open and responsible government; preserve the integrity of the governmental decision-making process; and protect the rights of individuals through the administration of Wisconsin's campaign finance, lobbying and ethics laws and through readily available and understandable disclosure of information.

## **PROGRAMS, GOALS, OBJECTIVES AND ACTIVITIES**

### **Program 1: Ethics, Campaign Finance and Lobbying Regulation**

Goal: Facilitate compliance with the requirements of Wisconsin's campaign finance, lobbying and ethics laws.

Objective/Activity: Provide training, educational materials and assistance to the regulated community and the public, focusing on applicable registration and reporting requirements.

Objective/Activity: Conduct timely audits of registration and report information, consistent with statutory requirements.

Objective/Activity: Provide formal and informal advisory opinions, as well as informal guidance, in a timely manner upon request.

Goal: Support the operation of open and responsible government, preserve the integrity of governmental decision making and protect the rights of individuals.

Objective/Activity: Promptly make reported campaign finance, lobbying and financial disclosure information publicly available.

Objective/Activity: Maintain the Wisconsin Campaign Finance Information System (CFIS), Eye on Lobbying Web site and Statements of Economic Interests Web site in order to facilitate the registration and reporting requirements under applicable Wisconsin statutes, as well as making the disclosure of reported information readily accessible and understandable.

Objective/Activity: Investigate complaints of possible violations of the ethics code, lobbying law and campaign finance law and seek appropriate remedies as circumstances merit.

## PERFORMANCE MEASURES

### 2023 AND 2024 GOALS AND ACTUALS

Prog. No.	Performance Measure	Goal 2023	Actual 2023	Goal 2024	Actual 2024
1.	Percentage of fees received by electronic payment methods.	95%	88% <sup>1</sup>	95%	96.4%
1.	Percentage of campaign finance reports filed on or before the required date.	96%	91.6% <sup>2</sup>	96%	88.5%
1.	Percentage of committees in compliance, based on audit findings.	95%	94%	95%	93%
1.	Percentage of lobbyist time reports completed on or before the required date.	99%	99.6%	99%	99.6%
1.	Percentage of registered principals completing their Statements of Lobbying Activities and Expenditures on or before the required date.	99%	97.1%	99%	97.5%
1.	Percentage of principals in compliance, based on audit findings.	99% <sup>3</sup>	99%	99%	99%
1.	Percentage of required Statements of Economic Interest filed on or before the required date.	96%	92.1%	96%	96.1%
1.	Statements of Economic Interest filed electronically.	96%	99%	96%	98.1%

Note: Based on fiscal year.

<sup>1</sup> Lobbyists and principals are not required to pay their fees electronically. Electronic payment of fees varies significantly during odd fiscal years. During the first 3 months that fees can be paid, there is a significantly higher number of fees paid by mail than there is for the rest of the session. This is because many principals register, and lobbyists get licensed prior to the beginning of the new legislative session and their accountants prefer to pay by check. After that, the vast majority of fees are paid electronically.

<sup>2</sup> The Commission's notification process has not changed. The Commission typically provides notice of an upcoming filing deadline several times before the due date, including a reminder on the due date. Ultimately, it is the registrant's responsibility to file their required reports on time.

<sup>3</sup> Due to IT changes relating to the creation of the new lobbying website, the new website's impact on auditing processes, and demands on staff related thereto, this data cannot be calculated in the same way as it had been previously done. Therefore, this performance measure is an approximation. However, the Commission has reviewed the pertinent data and there is no evidence to support any remarkable changes in this performance metric.

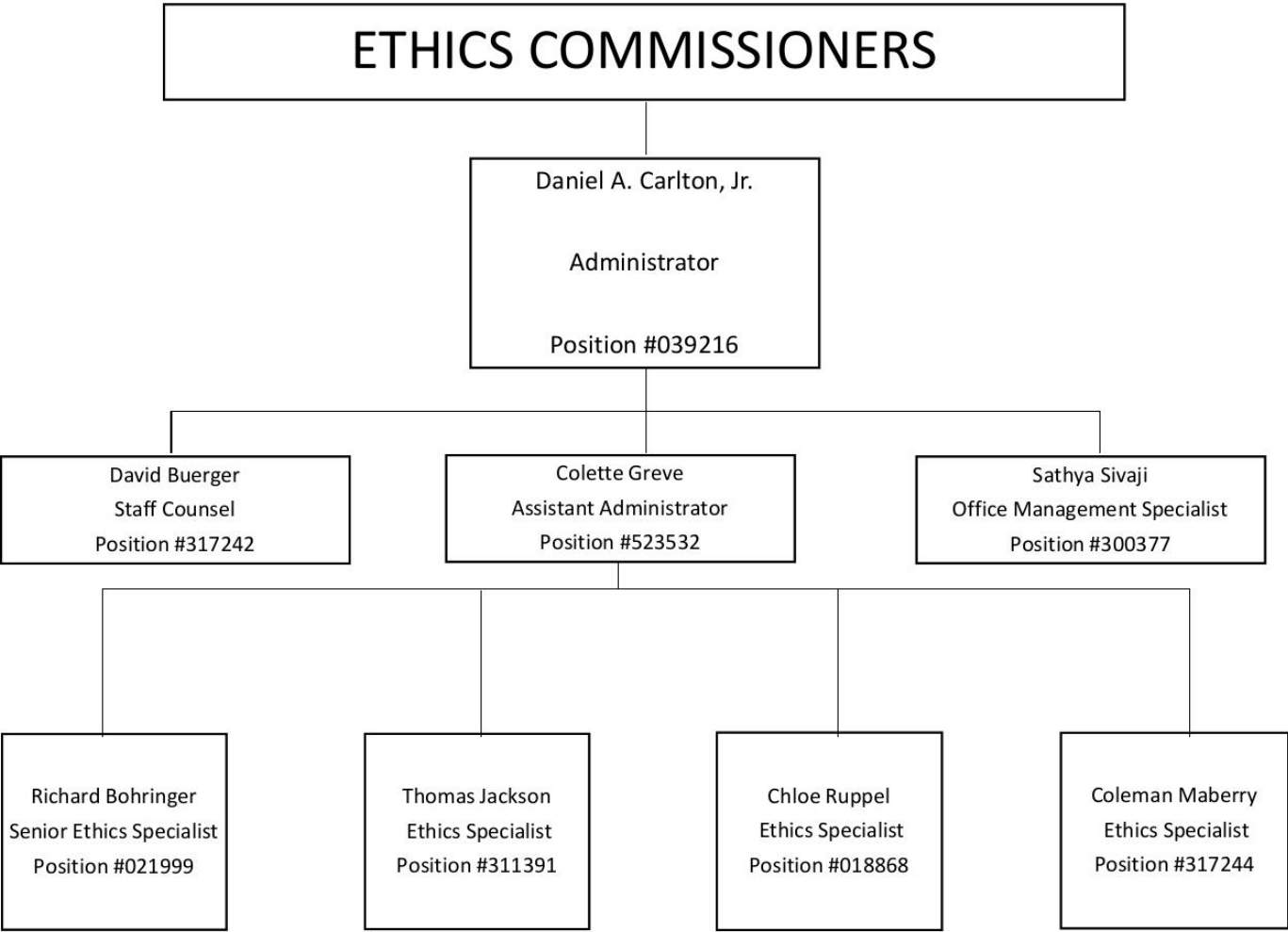
**2025, 2026 AND 2027 GOALS**

<b>Prog. No.</b>	<b>Performance Measure</b>	<b>Goal 2025</b>	<b>Goal 2026</b>	<b>Goal 2027</b>
1.	Percentage of fees received by electronic payment methods.	95%	95%	95%
1.	Percentage of campaign finance reports filed on or before the required date.	96%	96%	96%
1.	Percentage of committees in compliance, based on audit findings.	95%	95%	95%
1.	Percentage of lobbyist time reports completed on or before the required date.	99%	99%	99%
1.	Percentage of registered principals completing their Statements of Lobbying Activities and Expenditures on or before the required date.	99%	99%	99%
1.	Percentage of principals in compliance, based on audit findings.	99%	99%	99%
1.	Percentage of required Statements of Economic Interest filed on or before the required date.	96%	96%	96%
1.	Statements of Economic Interest filed electronically.	96%	98%	98%

Note: Based on fiscal year.



# WISCONSIN ETHICS COMMISSION ORGANIZATIONAL CHART



# Agency Total by Fund Source

Ethics Commission

2527 Biennial Budget

		ANNUAL SUMMARY						BIENNIAL SUMMARY			
Source of Funds		Prior Year Total	Adjusted Base	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE	Base Year Doubled (BYD)	Biennial Request	Change From (BYD)	Change From BYD %
GPR	S	\$906,953	\$1,033,900	\$4,436,400	\$4,091,400	27.00	27.00	\$2,067,800	\$8,527,800	\$6,460,000	312.40%
<b>Total</b>		\$906,953	\$1,033,900	\$4,436,400	\$4,091,400	27.00	27.00	\$2,067,800	\$8,527,800	\$6,460,000	312.40%
PR	S	\$496,842	\$543,200	\$36,200	\$36,200	0.00	0.00	\$1,086,400	\$72,400	(\$1,014,000)	-93.30%
<b>Total</b>		\$496,842	\$543,200	\$36,200	\$36,200	0.00	0.00	\$1,086,400	\$72,400	(\$1,014,000)	-93.30%
<b>Grand Total</b>		\$1,403,795	\$1,577,100	\$4,472,600	\$4,127,600	27.00	27.00	\$3,154,200	\$8,600,200	\$5,446,000	172.70%

# Agency Total by Program

Ethics Commission

2527 Biennial Budget

		ANNUAL SUMMARY					BIENNIAL SUMMARY				
Source of Funds	Prior Year Total	Adjusted Base	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE	Base Year Doubled (BYD)	Biennial Request	Change From (BYD)	Change From BYD %	
<b>01 Ethics, campaign finance and lobbying regulation</b>											
<b>Non Federal</b>											
<b>GPR</b>		<b>\$906,953</b>	<b>\$1,033,900</b>	<b>\$4,436,400</b>	<b>\$4,091,400</b>	<b>27.00</b>	<b>27.00</b>	<b>\$2,067,800</b>	<b>\$8,527,800</b>	<b>\$6,460,000</b>	<b>312.41%</b>
	S	\$906,953	\$1,033,900	\$4,436,400	\$4,091,400	27.00	27.00	\$2,067,800	\$8,527,800	\$6,460,000	312.41%
<b>PR</b>		<b>\$496,842</b>	<b>\$543,200</b>	<b>\$36,200</b>	<b>\$36,200</b>	<b>0.00</b>	<b>0.00</b>	<b>\$1,086,400</b>	<b>\$72,400</b>	<b>(\$1,014,000)</b>	<b>-93.34%</b>
	S	\$496,842	\$543,200	\$36,200	\$36,200	0.00	0.00	\$1,086,400	\$72,400	(\$1,014,000)	-93.34%
<b>Total - Non Federal</b>		<b>\$1,403,795</b>	<b>\$1,577,100</b>	<b>\$4,472,600</b>	<b>\$4,127,600</b>	<b>27.00</b>	<b>27.00</b>	<b>\$3,154,200</b>	<b>\$8,600,200</b>	<b>\$5,446,000</b>	<b>172.66%</b>
	S	\$1,403,795	\$1,577,100	\$4,472,600	\$4,127,600	27.00	27.00	\$3,154,200	\$8,600,200	\$5,446,000	172.66%
<b>PGM 01 Total</b>		<b>\$1,403,795</b>	<b>\$1,577,100</b>	<b>\$4,472,600</b>	<b>\$4,127,600</b>	<b>27.00</b>	<b>27.00</b>	<b>\$3,154,200</b>	<b>\$8,600,200</b>	<b>\$5,446,000</b>	<b>172.66%</b>
<b>GPR</b>		<b>\$906,953</b>	<b>\$1,033,900</b>	<b>\$4,436,400</b>	<b>\$4,091,400</b>	<b>27.00</b>	<b>27.00</b>	<b>\$2,067,800</b>	<b>\$8,527,800</b>	<b>\$6,460,000</b>	<b>312.41%</b>
	S	\$906,953	\$1,033,900	\$4,436,400	\$4,091,400	27.00	27.00	\$2,067,800	\$8,527,800	\$6,460,000	312.41%
<b>PR</b>		<b>\$496,842</b>	<b>\$543,200</b>	<b>\$36,200</b>	<b>\$36,200</b>	<b>0.00</b>	<b>0.00</b>	<b>\$1,086,400</b>	<b>\$72,400</b>	<b>(\$1,014,000)</b>	<b>-93.34%</b>
	S	\$496,842	\$543,200	\$36,200	\$36,200	0.00	0.00	\$1,086,400	\$72,400	(\$1,014,000)	-93.34%
<b>TOTAL 01</b>		<b>\$1,403,795</b>	<b>\$1,577,100</b>	<b>\$4,472,600</b>	<b>\$4,127,600</b>	<b>27.00</b>	<b>27.00</b>	<b>\$3,154,200</b>	<b>\$8,600,200</b>	<b>\$5,446,000</b>	<b>172.66%</b>
	S	\$1,403,795	\$1,577,100	\$4,472,600	\$4,127,600	27.00	27.00	\$3,154,200	\$8,600,200	\$5,446,000	172.66%

# Agency Total by Program

Ethics Commission

2527 Biennial Budget

<b>AGENCY TOTAL</b>	\$1,403,795	\$1,577,100	\$4,472,600	\$4,127,600	27.00	27.00	\$3,154,200	\$8,600,200	\$5,446,000	172.66%
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# Agency Total by Decision Item

Ethics Commission

2527 Biennial Budget

Decision Item	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
2000 Adjusted Base Funding Level	\$1,577,100	\$1,577,100	8.00	8.00
3003 Full Funding of Continuing Position Salaries and Fringe Benefits	(\$14,600)	(\$14,600)	0.00	0.00
3005 Reclassifications and Semiautomatic Pay Progression	\$23,300	\$23,300	0.00	0.00
4000 Needs resulting from Passage of 2023 Act 126	\$2,526,000	\$2,241,000	19.00	19.00
4001 Continuing Needs for New Campaign Finance Registration and Reporting System	\$196,000	\$151,000	0.00	0.00
4002 Other IT Needs	\$164,800	\$149,800	0.00	0.00
4003 Ending Reliance on Lobbying Program Revenue	\$0	\$0	0.00	0.00
<b>TOTAL</b>	<b>\$4,472,600</b>	<b>\$4,127,600</b>	<b>27.00</b>	<b>27.00</b>

# GPR Earned

2527 Biennial Budget

	<b>CODES</b>	<b>TITLES</b>
<b>DEPARTMENT</b>	521	Ethics Commission
<b>PROGRAM</b>	01	Ethics, campaign finance and lobbying regulation
<b>DATE</b>	09/10/2024	

Revenue	Prior Year Actuals	Base Year Estimate	1st Year Estimate	2nd Year Estimate
Opening Balance	\$0	\$0	\$430,400	\$700,000
<b>TOTAL</b>	<b>\$0</b>	<b>\$0</b>	<b>\$430,400</b>	<b>\$700,000</b>

# Program Revenue

2527 Biennial Budget

	CODES	TITLES
DEPARTMENT	521	Ethics Commission
PROGRAM	01	Ethics, campaign finance and lobbying regulation
SUBPROGRAM		
NUMERIC APPROPRIATION	20	General program operations; PR

Revenue and Expenditures	Prior Year Actuals	Base Year Estimate	1st Year Estimate	2nd Year Estimate
<b>Opening Balance</b>	<b>\$325,384</b>	<b>\$291,500</b>	<b>\$171,700</b>	<b>\$170,000</b>
CF Filing Fees	\$26,523	\$30,000	\$30,000	\$30,000
<b>Total Revenue</b>	<b>\$351,907</b>	<b>\$321,500</b>	<b>\$201,700</b>	<b>\$200,000</b>
<b>Expenditures</b>	<b>\$60,480</b>	<b>\$149,800</b>	<b>\$0</b>	<b>\$0</b>
2000 Adjusted Base Funding Level	\$0	\$0	\$31,700	\$31,700
<b>Total Expenditures</b>	<b>\$60,480</b>	<b>\$149,800</b>	<b>\$31,700</b>	<b>\$31,700</b>
<b>Closing Balance</b>	<b>\$291,427</b>	<b>\$171,700</b>	<b>\$170,000</b>	<b>\$168,300</b>

# Program Revenue

2527 Biennial Budget

	CODES	TITLES
DEPARTMENT	521	Ethics Commission
PROGRAM	01	Ethics, campaign finance and lobbying regulation
SUBPROGRAM		
NUMERIC APPROPRIATION	21	Gifts and grants

Revenue and Expenditures	Prior Year Actuals	Base Year Estimate	1st Year Estimate	2nd Year Estimate
Opening Balance	\$17,616	\$17,700	\$17,700	\$17,700
Total Revenue	\$17,616	\$17,700	\$17,700	\$17,700
Expenditures	\$0	\$0	\$0	\$0
Total Expenditures	\$0	\$0	\$0	\$0
Closing Balance	\$17,616	\$17,700	\$17,700	\$17,700



# Program Revenue

2527 Biennial Budget

	<b>CODES</b>	<b>TITLES</b>
<b>DEPARTMENT</b>	521	Ethics Commission
<b>PROGRAM</b>	01	Ethics, campaign finance and lobbying regulation
<b>SUBPROGRAM</b>		
<b>NUMERIC APPROPRIATION</b>	22	Materials and services

<b>Revenue and Expenditures</b>	<b>Prior Year Actuals</b>	<b>Base Year Estimate</b>	<b>1st Year Estimate</b>	<b>2nd Year Estimate</b>
<b>Opening Balance</b>	\$2,020	\$2,100	\$2,100	\$2,100
<b>Total Revenue</b>	\$2,020	\$2,100	\$2,100	\$2,100
<b>Expenditures</b>	\$0	\$0	\$0	\$0
<b>Total Expenditures</b>	\$0	\$0	\$0	\$0
<b>Closing Balance</b>	\$2,020	\$2,100	\$2,100	\$2,100

# Program Revenue

2527 Biennial Budget

	CODES	TITLES
DEPARTMENT	521	Ethics Commission
PROGRAM	01	Ethics, campaign finance and lobbying regulation
SUBPROGRAM		
NUMERIC APPROPRIATION	23	Lobbying admin; PR

Revenue and Expenditures	Prior Year Actuals	Base Year Estimate	1st Year Estimate	2nd Year Estimate
<b>Opening Balance</b>	<b>\$365,495</b>	<b>\$47,900</b>	<b>\$311,400</b>	<b>\$0</b>
Lobbying License Fees	\$118,720	\$700,000	\$119,000	\$700,000
<b>Total Revenue</b>	<b>\$484,215</b>	<b>\$747,900</b>	<b>\$430,400</b>	<b>\$700,000</b>
<b>Expenditures</b>	<b>\$436,362</b>	<b>\$436,500</b>	<b>\$0</b>	<b>\$0</b>
2000 Adjusted Base Funding Level	\$0	\$0	\$507,000	\$507,000
3003 Full Funding of Continuing Position Salaries and Fringe Benefits	\$0	\$0	(\$5,200)	(\$5,200)
3005 Reclassifications and Semiautomatic Pay Progression	\$0	\$0	\$10,100	\$10,100
4003 Ending Reliance on Lobbying Program Revenue	\$0	\$0	(\$511,900)	(\$511,900)
Transfer to General Fund	\$0	\$0	\$430,400	\$700,000
<b>Total Expenditures</b>	<b>\$436,362</b>	<b>\$436,500</b>	<b>\$430,400</b>	<b>\$700,000</b>
<b>Closing Balance</b>	<b>\$47,853</b>	<b>\$311,400</b>	<b>\$0</b>	<b>\$0</b>

**Decision Item (DIN) - 2000**

**Decision Item (DIN) Title - Adjusted Base Funding Level**

**NARRATIVE**

Adjusted Base Funding Level

# Decision Item by Line

2527 Biennial Budget

<b>DEPARTMENT</b>	<b>CODES</b>	<b>TITLES</b>
	521	Ethics Commission
<b>DECISION ITEM</b>	<b>CODES</b>	<b>TITLES</b>
	2000	Adjusted Base Funding Level

	<b>Expenditure Items</b>	<b>1st Year Cost</b>	<b>2nd Year Cost</b>
01	Permanent Position Salaries	\$641,000	\$641,000
02	Turnover	\$0	\$0
03	Project Position Salaries	\$0	\$0
04	LTE/Misc. Salaries	\$3,800	\$3,800
05	Fringe Benefits	\$232,400	\$232,400
06	Supplies and Services	\$698,300	\$698,300
07	Permanent Property	\$1,600	\$1,600
08	Unallotted Reserve	\$0	\$0
09	Aids to Individuals & Organizations	\$0	\$0
10	Local Assistance	\$0	\$0
11	One-time Financing	\$0	\$0
12	Debt service	\$0	\$0
13		\$0	\$0
14		\$0	\$0
15		\$0	\$0
16		\$0	\$0
<b>17</b>	<b>TOTAL</b>	<b>\$1,577,100</b>	<b>\$1,577,100</b>
18	Project Positions Authorized	0.00	0.00
19	Classified Positions Authorized	6.00	6.00
20	Unclassified Positions Authorized	2.00	2.00

# Decision Item by Numeric

2527 Biennial Budget

## Ethics Commission

Program	Decision Item/Numeric	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
	<b>2000 Adjusted Base Funding Level</b>				
01	Ethics, campaign finance and lobbying regulation				
	01 General program ops; GPR	\$808,900	\$808,900	4.70	4.70
	05 Investigations	\$225,000	\$225,000	0.00	0.00
	20 General program operations; PR	\$31,700	\$31,700	0.00	0.00
	22 Materials and services	\$4,500	\$4,500	0.00	0.00
	23 Lobbying admin; PR	\$507,000	\$507,000	3.30	3.30
	<b>Ethics, campaign finance and lobbying regulation Sub Total</b>	<b>\$1,577,100</b>	<b>\$1,577,100</b>	<b>8.00</b>	<b>8.00</b>
	<b>Adjusted Base Funding Level Sub Total</b>	<b>\$1,577,100</b>	<b>\$1,577,100</b>	<b>8.00</b>	<b>8.00</b>
	<b>Agency Total</b>	<b>\$1,577,100</b>	<b>\$1,577,100</b>	<b>8.00</b>	<b>8.00</b>

# Decision Item by Fund Source

2527 Biennial Budget

## Ethics Commission

Decision Item/Source of Funds		1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
<b>2000 Adjusted Base Funding Level</b>					
GPR	S	\$1,033,900	\$1,033,900	4.70	4.70
PR	S	\$543,200	\$543,200	3.30	3.30
<b>Adjusted Base Funding Level Total</b>		<b>\$1,577,100</b>	<b>\$1,577,100</b>	<b>8.00</b>	<b>8.00</b>
<b>Agency Total</b>		<b>\$1,577,100</b>	<b>\$1,577,100</b>	<b>8.00</b>	<b>8.00</b>

**Decision Item (DIN) - 3003**

**Decision Item (DIN) Title - Full Funding of Continuing Position Salaries and Fringe Benefits**

**NARRATIVE**

Standard Budget Adjustment - Full Funding of Continuing Position Salaries and Fringe Benefits

# Decision Item by Line

2527 Biennial Budget

<b>DEPARTMENT</b>	<b>CODES</b>	<b>TITLES</b>
	521	Ethics Commission
<b>DECISION ITEM</b>	<b>CODES</b>	<b>TITLES</b>
	3003	Full Funding of Continuing Position Salaries and Fringe Benefits

	<b>Expenditure Items</b>	<b>1st Year Cost</b>	<b>2nd Year Cost</b>
01	Permanent Position Salaries	(\$14,100)	(\$14,100)
02	Turnover	\$0	\$0
03	Project Position Salaries	\$0	\$0
04	LTE/Misc. Salaries	\$0	\$0
05	Fringe Benefits	(\$500)	(\$500)
06	Supplies and Services	\$0	\$0
07	Permanent Property	\$0	\$0
08	Unallotted Reserve	\$0	\$0
09	Aids to Individuals & Organizations	\$0	\$0
10	Local Assistance	\$0	\$0
11	One-time Financing	\$0	\$0
12	Debt service	\$0	\$0
13		\$0	\$0
14		\$0	\$0
15		\$0	\$0
16		\$0	\$0
<b>17</b>	<b>TOTAL</b>	<b>(\$14,600)</b>	<b>(\$14,600)</b>
18	Project Positions Authorized	0.00	0.00
19	Classified Positions Authorized	0.00	0.00
20	Unclassified Positions Authorized	0.00	0.00



# Decision Item by Numeric

2527 Biennial Budget

## Ethics Commission

Program	Decision Item/Numeric	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
	<b>3003 Full Funding of Continuing Position Salaries and Fringe Benefits</b>				
01	Ethics, campaign finance and lobbying regulation				
	01 General program ops; GPR	(\$9,400)	(\$9,400)	0.00	0.00
	23 Lobbying admin; PR	(\$5,200)	(\$5,200)	0.00	0.00
	<b>Ethics, campaign finance and lobbying regulation Sub Total</b>	<b>(\$14,600)</b>	<b>(\$14,600)</b>	<b>0.00</b>	<b>0.00</b>
	<b>Full Funding of Continuing Position Salaries and Fringe Benefits Sub Total</b>	<b>(\$14,600)</b>	<b>(\$14,600)</b>	<b>0.00</b>	<b>0.00</b>
	<b>Agency Total</b>	<b>(\$14,600)</b>	<b>(\$14,600)</b>	<b>0.00</b>	<b>0.00</b>

# Decision Item by Fund Source

2527 Biennial Budget

## Ethics Commission

Decision Item/Source of Funds		1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
<b>3003 Full Funding of Continuing Position Salaries and Fringe Benefits</b>					
GPR	S	(\$9,400)	(\$9,400)	0.00	0.00
PR	S	(\$5,200)	(\$5,200)	0.00	0.00
<b>Full Funding of Continuing Position Salaries and Fringe Benefits Total</b>		<b>(\$14,600)</b>	<b>(\$14,600)</b>	<b>0.00</b>	<b>0.00</b>
<b>Agency Total</b>		<b>(\$14,600)</b>	<b>(\$14,600)</b>	<b>0.00</b>	<b>0.00</b>

**Decision Item (DIN) - 3005**

**Decision Item (DIN) Title - Reclassifications and Semiautomatic Pay Progression**

**NARRATIVE**

Standard Budget Adjustment - Reclassifications and Semiautomatic Pay Progression

## **DIN 3005: Reclassification of Current Entry Ethics Specialists**

As a result of the passage of 2023 Wisconsin Act 126, the Commission will need to hire 13 additional ethics specialists. At the same time, the Commission will also need to reclassify the 3 current Entry Ethics Specialists to be Senior Ethics Specialists. These individuals have shown the necessary skills and independence to have earned the reclassification. Further, they will be expected to take on additional new duties and responsibilities in assisting the new Entry Ethics Specialists. To accommodate the need to reclassify these individuals, the Commission requests sufficient funds to be able to do so.

# Decision Item by Line

2527 Biennial Budget

<b>DEPARTMENT</b>	<b>CODES</b>	<b>TITLES</b>
	521	Ethics Commission

<b>DECISION ITEM</b>	<b>CODES</b>	<b>TITLES</b>
	3005	Reclassifications and Semiautomatic Pay Progression

	<b>Expenditure Items</b>	<b>1st Year Cost</b>	<b>2nd Year Cost</b>
01	Permanent Position Salaries	\$20,300	\$20,300
02	Turnover	\$0	\$0
03	Project Position Salaries	\$0	\$0
04	LTE/Misc. Salaries	\$0	\$0
05	Fringe Benefits	\$3,000	\$3,000
06	Supplies and Services	\$0	\$0
07	Permanent Property	\$0	\$0
08	Unallotted Reserve	\$0	\$0
09	Aids to Individuals & Organizations	\$0	\$0
10	Local Assistance	\$0	\$0
11	One-time Financing	\$0	\$0
12	Debt service	\$0	\$0
13		\$0	\$0
14		\$0	\$0
15		\$0	\$0
16		\$0	\$0
<b>17</b>	<b>TOTAL</b>	<b>\$23,300</b>	<b>\$23,300</b>
18	Project Positions Authorized	0.00	0.00
19	Classified Positions Authorized	0.00	0.00
20	Unclassified Positions Authorized	0.00	0.00

# Decision Item by Numeric

2527 Biennial Budget

## Ethics Commission

Program	Decision Item/Numeric	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
	<b>3005 Reclassifications and Semiautomatic Pay Progression</b>				
01	Ethics, campaign finance and lobbying regulation				
	01 General program ops; GPR	\$13,200	\$13,200	0.00	0.00
	23 Lobbying admin; PR	\$10,100	\$10,100	0.00	0.00
	<b>Ethics, campaign finance and lobbying regulation Sub Total</b>	<b>\$23,300</b>	<b>\$23,300</b>	<b>0.00</b>	<b>0.00</b>
	<b>Reclassifications and Semiautomatic Pay Progression Sub Total</b>	<b>\$23,300</b>	<b>\$23,300</b>	<b>0.00</b>	<b>0.00</b>
	<b>Agency Total</b>	<b>\$23,300</b>	<b>\$23,300</b>	<b>0.00</b>	<b>0.00</b>

# Decision Item by Fund Source

2527 Biennial Budget

## Ethics Commission

Decision Item/Source of Funds		1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
<b>3005 Reclassifications and Semiautomatic Pay Progression</b>					
GPR	S	\$13,200	\$13,200	0.00	0.00
PR	S	\$10,100	\$10,100	0.00	0.00
<b>Reclassifications and Semiautomatic Pay Progression Total</b>		<b>\$23,300</b>	<b>\$23,300</b>	<b>0.00</b>	<b>0.00</b>
<b>Agency Total</b>		<b>\$23,300</b>	<b>\$23,300</b>	<b>0.00</b>	<b>0.00</b>

**Decision Item (DIN) - 4000**

**Decision Item (DIN) Title - Needs resulting from Passage of 2023 Act 126**

**NARRATIVE**

See attached narrative.



## **DIN 4000: Needs resulting from Passage of 2023 Act 126**

The Legislature passed 2023 Wisconsin Act 126 earlier this year. It was signed into law on March 21, 2024. This Act requires all local campaign finance committees to register and report to the Ethics Commission instead of their local filing officers. The Commission will assume responsibility for a significant amount of work currently performed by the 2,345 local filing officers, plus their staff. The Act takes effect on July 1, 2025.

The Commission will need a lot of additional resources to take over this work. While the local filing officers were charged with making the forms available and maintaining a filing system, the Commission is expected to do that and also conduct audits of the additional filings. This investment will provide significant benefits to the public. Not only will committee registration and reports be available in a central, online repository, the public will be assured that those reports are accurate and comply with the law. Further, as a result of the Act, there will be more consistent application of the campaign finance laws statewide. For example, there is a lot of confusion about whether a committee qualifies for exempt status and whether candidates' spending on their own campaigns are considered a contribution. However, this is dependent on the Commission being properly funded.

To assume the additional responsibilities currently being performed by more than 2,345 local filing officers and their staff, the Commission will need additional staff and will need to make changes related to current staff. The Commission will also need to relocate so there is sufficient office space. Lastly, the Commission will need equipment and other resources to conduct the needed training across the state.

### **1. Additional Staffing Needs**

#### **Ethics Specialists**

The Commission's Ethics Specialists serve as the front-line administering Wisconsin's campaign finance laws, lobbying laws, and ethics laws. These individuals provide the regulated communities and the public information about registration, reporting, and how to understand reports. They advise registrants how to register and file reports. Additionally, with assistance from legal counsel, the Assistant Administrator, and the Administrator, they provide advice to the

regulated communities about how to comply with legal requirements. Finally, they conduct audits to assure compliance with the reporting requirements.

Historically, there has been no definitive tracking of the number of registrants there are that file locally. The Commission is committed to submitting a budget request that will allow it to carry out its responsibilities, while respecting the fact that these services are being provided at taxpayer expense. So, to make sure this budget request did not exceed actual needs, the Commission staff sent a survey to the local filing officers to try to ascertain the additional workload the Commission will be responsible for as a result of the Act. This survey requested information concerning the number of total committees are registered with the local filing officer, the number of those committees that are exempt from reporting, as well as information about the number of reports filed.

The Commission received 628 responses to the survey. One thing we learned from the survey is that there is significant confusion over whether a candidate has, or is required to have, a candidate committee. Of the 628 responses, 320 respondents indicated that they do not have any candidate committees. Clearly, this is concerning because the law requires every candidate to have a candidate committee. Of the remaining responses, some were invalid because they indicated that they had more exempt committees than they had total committees. We received 297 plausible responses.

Based on the responses and the Commission's own data at the state level, the Commission could reasonably expect to have between 23,450 and 66,294 additional registrants as a result of the Act. The Commission believes that the most realistic number of additional registrants to expect will be 30,480 registrants. Further, the Commission expects that approximately 75% of these registrants will be exempt from filing reports. This is important because that will reduce the amount of work needed and needed to be considered in formulating this budget request. The Commission expects that about 22,860 of the 30,480 new registrants will be exempt. This means that the Commission will be responsible for an additional 7,620 new, active registrants. This is 589% more than the Commission currently handles. Knowing this, the Commission is able to calculate the additional number of hours anticipated.

Currently, the Commission has 4 Ethics Specialists who are responsible for 1,293 active state committees. Commission staff tracked their time spent on campaign finance matters during the month of July 2024. Ethics Specialists worked a total of 330 hours on campaign finance matters

during that month. Based on this, and the additional number of active new registrants, the Commission expects an additional 1,947 hours per month. That means there will be an additional 23,364 hours of work to perform. A state employee is paid for 2080 hours per year. However, if you include paid time off, a state employee typically works approximately 1,793 hours per year. So, to calculate the number of additional ethics specialists needed, one simply needs to divide 23,364 hours of work per year by 1,793 hours the average employee works. This yields a result of 13 additional Ethics Specialists needed.

Therefore, the Commission requests creation of, and funding for, 13 new Entry Ethics Specialists. The Commission hires Entry Ethics Specialists at a rate of \$28.73, plus fringe costs. The Commission's fringe rate for the upcoming biennium is 36.95%.

### **Trainers**

The Commission's primary objective is to achieve compliance through education, advice, and training. While enforcement is a necessary component of administering the laws within its jurisdiction, the Commission would strongly prefer to achieve compliance through education, advice, and training. There are commissions similar to the Wisconsin Ethics Commission across the country. Many of these commissions publish compliance data either online or in their annual reports. A close review of the composition of those commissions shows that the ones with the best compliance rates employ staff who are dedicated solely/primarily to training registrants regarding the laws and their systems. Some states conduct 50-100 training sessions per year.

As noted above, the Commission knows that there is no uniformity to how the campaign finance laws are being implemented at the local level. There is obvious confusion regarding what is required and how to report required information. Many local candidates and clerks are not receiving sufficient, if any, training regarding campaign finance. Knowing this, the Commission must take significant action to educate local registrants as soon as possible. In person training is a critical component of this transition. Without it, there will be more compliance issues and the concomitant work associated with those issues.

With education being the highest priority to ensure compliance, this means that the Commission must have staff to carry out those trainings. In the time leading up to implementing the Act, and for the rest of the upcoming biennium, the Commission needs to do as much as possible to reach every community and provide them educational opportunities. During the first

year of administering local campaign finance, the Commission will need to have in person training sessions throughout the state. The Commission plans to go to each of the 72 counties to provide these in person training sessions during the first year. The Commission will also conduct a number of online training sessions for those who can attend virtually. We expect to travel to conduct 80 in person training sessions just before and during the first year of assuming responsibility for local registrants. During the second year, the Commission will reduce the number of in person training sessions by approximately half, while increasing online trainings.

The Commission requests the creation of, and funding for, two trainer positions. The Commission requests one permanent trainer position and one project trainer position for the biennium. At the end of the biennium, the Commission will evaluate whether it needs to convert the project position to determine whether it should be made permanent. The Commission intends to hire the permanent position at a Senior level with anticipate salary of \$39/hr., plus fringe costs. The Commission intends to hire the project position as a non-senior position with the anticipate salary being \$35/hr., plus fringe. The Commission also requests funding for the biennium for travel and associated per diem costs incurred by the trainers. The Commission calculated this amount based on the current allowances for meals, lodging, and the current mileage rate.

### **Attorneys**

Currently, the Commission has one attorney. While some legal duties are presently carried out by the Assistant Administrator, the availability of that person's assistance is limited by the need to supervise Ethics Specialists and perform other duties required of that position. Over the years, the amount of legal work has steadily increased. This is also true of the complexity of that work. Even currently, the attorney position is insufficient to support the full needs of the Commission. When the Commission assumes responsibility for administering the law for local registrants, the legal work of the Commission will increase exponentially.

First and foremost, there will be a significant increase in the need for attorneys to participate in education and advice. Across the state, the level of awareness about the Commission and what it does is inconsistent. Some communities are very aware of the Commission and what its role in government is. Others, however, are largely unaware of the Commission and its duties. This is going to change significantly. The Commission will need attorneys to help ensure that the

trainers' materials accurately convey legal requirements. The Commission will also need these attorneys to directly provide advice to the local registrants.

Next, the Commission will need additional attorneys to revise existing administrative rules and promulgate new rules. For example, the Commission will want to review its standard settlement schedule and make appropriate changes. One such potential change is to establish lower standard settlement amounts for local registrants, which is important considering that so many of these races cost very little to run.

Finally, on the enforcement side, the Commission will need additional attorneys to negotiate and draft settlement agreements that arise from audit findings. The Commission will also need additional attorneys to answer questions about the complaint process and to process complaints that are filed with the Commission. In the event that a settlement is not able to be reached, the Commission may choose to file a civil action to enforce the laws it administers. This number can also be expected to increase significantly.

There is no way to accurately predict fully the additional legal work that will be needed to be performed by the attorneys. However, looking at other Commission's with similar responsibilities, we can see what they do to administer the laws and how many attorneys they need to do so. After reviewing the roles and responsibilities of commission lawyers across the country, and the number of attorneys those commissions have, we would expect to have at least a total of 4 attorneys on staff.

To carry out the increased legal work, the Commission is requesting that there be 3 new attorney positions created and funded. The Commission requests that one attorney position be created as a permanent Attorney Supervisor position. This position will, with the assistance of the Administrator, supervise the legal unit and provide legal services to the Commission. The Commission also requests the creation of 2 additional permanent attorney positions. In addition to the current attorney position, the attorneys will be responsible for verifying that education and training accurately conveys the law; reviewing, revising, and creating new informal guidance documents; providing informal advice via telephone and email; providing draft binding legal advice to be approved by the Commission or the Administrator; general supervision over auditing and settlement drafting; complaint intake review and advising the Commission about complaints during the process; and litigation as needed.

The Commission anticipates hiring the Attorney Supervisor at \$61/hr., plus fringe costs. The Commission anticipates hiring the other attorney positions at \$53/hr., plus fringe costs.

### **Office Management Specialist**

Currently, the Commission has one Office Management Specialist. Under the direction and supervision of the Administrator, the incumbent is responsible for fiscal and budgetary processes, procurement, accounts receivable, serving as a liaison between the Commission and other agencies as needed for operational support, providing human resources assistance, and more. According to the motion approved by Joint Finance when the Commission was created, the Commission received this position but was to receive additional support in these areas via shared services provided by Elections Commission staff. While needed at times, this has not occurred. The Commission, as an autonomous entity with significant confidentiality restrictions, should not be expected to share information with other agencies because it does not supervise those employees. With the changes the Commission anticipates as a result of the act, there is going to be a significant increase in the amount of work related to these services. Further, due to its small size, the Commission is required to rely on several separation of duties exceptions to generally acceptable accounting practices. Therefore, the Commission requests creation and funding of an additional permanent Office Management Specialist position. The Commission anticipates hiring this position at the rate of the current Office Management Specialist position, which is \$30.92/hr., plus fringe costs.

Lastly, the Assistant Administrator will go from supervising 4 people to supervising approximately 17 people. Further, the going rate for the Attorney Supervisor position will be significantly higher than what the Assistant Administrator currently makes. To recognize the additional work and maintain appropriate hierarchical compensation levels, the Commission intends to increase the salary of the Assistant Administrator by \$24,045 plus fringe per year.

## **2. Office Space Costs**

The Commission currently has 8 Full Time Staff and 2 IT contractors. The current office space is not large enough to accommodate the additional staff needed as a result of the passage of the Act. Therefore, the Commission will need to relocate its offices. The Commission has consulted

with DOA Facilities staff regarding its needs. There is sufficient office space within the Department of Administration Building (where the Commission is currently housed) and access can be given to that space without the need for individuals to sign in at the front desk. While this space will require some reconfiguration, it will require less reconfiguration and other costs than other alternatives. DOA staff provided estimates for these costs and the new rent rate. The following are those costs:

- \$102,000 for construction in the new space (One-time cost);
- \$100,000 for costs relating to moving existing furniture and getting new furniture for the new positions (One-time cost); and
- \$111,178.88 rent per year.

The total costs for the biennium are expected to be \$424,357.76. The budget request already includes \$46,500 per year for the current rent. Therefore, if the DIN is approved, it will only add \$64,678.88 per year in rent, not the full \$111,178.88.

### **3. IT and Miscellaneous Costs**

The Commission will need additional equipment for the new staff including monitors, laptops, docking stations, keyboards, phones, computer mice, etc. The Commission will also need additional software licensing for the new staff. The Commission also needs to replace its existing copier/printer/scanner and, with the increased new staff, obtain a second machine. Additionally, the Commission expects a significant increase in its GSB costs charged by DET.

# Decision Item by Line

2527 Biennial Budget

<b>DEPARTMENT</b>	<b>CODES</b>	<b>TITLES</b>
	521	Ethics Commission
<b>DECISION ITEM</b>	<b>CODES</b>	<b>TITLES</b>
	4000	Needs resulting from Passage of 2023 Act 126

	<b>Expenditure Items</b>	<b>1st Year Cost</b>	<b>2nd Year Cost</b>
01	Permanent Position Salaries	\$1,293,700	\$1,293,700
02	Turnover	\$0	\$0
03	Project Position Salaries	\$72,800	\$72,800
04	LTE/Misc. Salaries	\$0	\$0
05	Fringe Benefits	\$499,800	\$499,800
06	Supplies and Services	\$374,700	\$374,700
07	Permanent Property	\$0	\$0
08	Unallotted Reserve	\$0	\$0
09	Aids to Individuals & Organizations	\$0	\$0
10	Local Assistance	\$0	\$0
11	One-time Financing	\$285,000	\$0
12	Debt service	\$0	\$0
13		\$0	\$0
14		\$0	\$0
15		\$0	\$0
16		\$0	\$0
<b>17</b>	<b>TOTAL</b>	<b>\$2,526,000</b>	<b>\$2,241,000</b>
18	Project Positions Authorized	1.00	1.00
19	Classified Positions Authorized	18.00	18.00
20	Unclassified Positions Authorized	0.00	0.00



# Decision Item by Numeric

2527 Biennial Budget

## Ethics Commission

Program	Decision Item/Numeric	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
	<b>4000 Needs resulting from Passage of 2023 Act 126</b>				
01	Ethics, campaign finance and lobbying regulation				
	01 General program ops; GPR	\$2,526,000	\$2,241,000	19.00	19.00
	<b>Ethics, campaign finance and lobbying regulation Sub Total</b>	<b>\$2,526,000</b>	<b>\$2,241,000</b>	<b>19.00</b>	<b>19.00</b>
	<b>Needs resulting from Passage of 2023 Act 126 Sub Total</b>	<b>\$2,526,000</b>	<b>\$2,241,000</b>	<b>19.00</b>	<b>19.00</b>
	<b>Agency Total</b>	<b>\$2,526,000</b>	<b>\$2,241,000</b>	<b>19.00</b>	<b>19.00</b>

# Decision Item by Fund Source

2527 Biennial Budget

## Ethics Commission

Decision Item/Source of Funds		1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
<b>4000 Needs resulting from Passage of 2023 Act 126</b>					
GPR	S	\$2,526,000	\$2,241,000	19.00	19.00
<b>Needs resulting from Passage of 2023 Act 126 Total</b>		<b>\$2,526,000</b>	<b>\$2,241,000</b>	<b>19.00</b>	<b>19.00</b>
<b>Agency Total</b>		<b>\$2,526,000</b>	<b>\$2,241,000</b>	<b>19.00</b>	<b>19.00</b>

**Decision Item (DIN) - 4001**

**Decision Item (DIN) Title - Continuing Needs for New Campaign Finance  
Registration and Reporting System**

**NARRATIVE**

See the attached narrative.

## **DIN 4001: Continuing Needs for New Campaign Finance Registration and Reporting System**

During the last biennium, the Commission got approval to work with a vendor, Civera, to build and maintain a new campaign finance information system. The project consisted of a build phase and a two-year maintenance phase. Ultimately, the Commission intends to take over complete control and ownership of the application. Initially, the build phase was to be completed in FY 2024. Then, there would be a two-year all-inclusive maintenance (including new features) period in fiscal years 2025 and 2026. However, due to unanticipated, unavoidable delays, completion of the build phase was delayed. The Commission anticipates completing the build phase of this project during calendar year 2024 (FY 2025). The Commission is not being charged for maintenance during this time and the costs of the maintenance agreement will be prorated to reflect beginning that after completion of the build phase.

The Commission's IT contractors will need two full years of support by the vendor to learn the new application and how to maintain and upgrade it. Therefore, in addition to the previously planned extension of the maintenance agreement in FY 2026, the Commission requests funding for an extension of the maintenance agreement for FY 2027. The vendor has agreed to do this at the same rate previously approved by the Legislature and Governor (\$135,000/year). Therefore, the Commission requests that it be appropriated \$135,000 per fiscal year of the upcoming biennium for the maintenance and support of the new campaign finance system.

Additionally, during the project, the vendor discovered that much of the data in the old system was duplicated data. The historical data the Commission possesses contains a significant amount of duplicated data or data that should be merged so that giving and spending are clearly tied to one, correct individual. Filers have not consistently entered a person's information the same way. This makes it appear that there are multiple people with similar names when, in fact, it is the same person. For example, let's say the contributor is Daniel Q. Smith, Jr., who lives at 1 East Elm Street, Oconomowoc, WI 53555. One time that person may be reported with that information. However, the next time, the committee uses the name Dan Smith, Jr. The time after that the committee reports the contributor as Daniel Smith. It is one person, but it looks like multiple separate people because the committee was not consistent in how it reported the information. According to the vendor, 71% of the historical data contains duplicates such as these. These duplicates cause confusion. They also slow down the system's ability to search through and display

accurate information. The new system was designed to reduce the instances of this and to make contribution limit monitoring and flag contributions triggering the occupation requirement. So, it should reduce the instances of this but clean up and matching will be required. The Commission is requesting \$20,000 during FY 2026 to optimize the historical data and improve the searching functionality.

Lastly, the contract did not contemplate creating an online payment page for campaign finance filing fees. The vendor is proposing to create an integrated payment system using Stripe, a worldwide payment facilitator. This system will track payments due, invoice them, show payment status, and allow for payment of campaign finance filing fees by credit, debit, ACH, Apple Pay, and other potentially secure options. The costs to build and integrate the system is expected to be \$25,000. Additionally, the maintenance of the system will add \$15,000 per year to the cost of the maintenance contract. While there are other options available, this option provides the best optimization features for the new site as well as provides more payment options for registrants.

# Decision Item by Line

2527 Biennial Budget

<b>DEPARTMENT</b>	<b>CODES</b>	<b>TITLES</b>
	521	Ethics Commission
<b>DECISION ITEM</b>	<b>CODES</b>	<b>TITLES</b>
	4001	Continuing Needs for New Campaign Finance Registration and Reporting System

	<b>Expenditure Items</b>	<b>1st Year Cost</b>	<b>2nd Year Cost</b>
01	Permanent Position Salaries	\$0	\$0
02	Turnover	\$0	\$0
03	Project Position Salaries	\$0	\$0
04	LTE/Misc. Salaries	\$0	\$0
05	Fringe Benefits	\$0	\$0
06	Supplies and Services	\$151,000	\$151,000
07	Permanent Property	\$0	\$0
08	Unallotted Reserve	\$0	\$0
09	Aids to Individuals & Organizations	\$0	\$0
10	Local Assistance	\$0	\$0
11	One-time Financing	\$45,000	\$0
12	Debt service	\$0	\$0
13		\$0	\$0
14		\$0	\$0
15		\$0	\$0
16		\$0	\$0
<b>17</b>	<b>TOTAL</b>	<b>\$196,000</b>	<b>\$151,000</b>
18	Project Positions Authorized	0.00	0.00
19	Classified Positions Authorized	0.00	0.00
20	Unclassified Positions Authorized	0.00	0.00

# Decision Item by Numeric

2527 Biennial Budget

## Ethics Commission

Program	Decision Item/Numeric	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
	<b>4001 Continuing Needs for New Campaign Finance Registration and Reporting System</b>				
01	Ethics, campaign finance and lobbying regulation				
	01 General program ops; GPR	\$196,000	\$151,000	0.00	0.00
	<b>Ethics, campaign finance and lobbying regulation Sub Total</b>	<b>\$196,000</b>	<b>\$151,000</b>	<b>0.00</b>	<b>0.00</b>
	<b>Continuing Needs for New Campaign Finance Registration and Reporting System Sub Total</b>	<b>\$196,000</b>	<b>\$151,000</b>	<b>0.00</b>	<b>0.00</b>
	<b>Agency Total</b>	<b>\$196,000</b>	<b>\$151,000</b>	<b>0.00</b>	<b>0.00</b>

# Decision Item by Fund Source

2527 Biennial Budget

## Ethics Commission

Decision Item/Source of Funds		1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
<b>4001 Continuing Needs for New Campaign Finance Registration and Reporting System</b>					
GPR	S	\$196,000	\$151,000	0.00	0.00
<b>Continuing Needs for New Campaign Finance Registration and Reporting System Total</b>		<b>\$196,000</b>	<b>\$151,000</b>	<b>0.00</b>	<b>0.00</b>
<b>Agency Total</b>		<b>\$196,000</b>	<b>\$151,000</b>	<b>0.00</b>	<b>0.00</b>



**Decision Item (DIN) - 4002**

**Decision Item (DIN) Title - Other IT Needs**

**NARRATIVE**

See the attached narrative.

## **DIN 4002: Other IT Needs**

Prior to the current biennium, the Commission only had one IT contractor who was responsible for creating, operating, maintaining, and updating the Commission's campaign finance, lobbying, and SEI reporting applications. The person also took care of other technological needs as assigned. This individual had no back up and was frequently contacted at times that she was to be on vacation. The Commission requested that it be funded to hire an additional IT contractor to assist with the work and provide backup to the current contractor. This funding was approved, and the IT contractor was hired and has been doing an exceptional job. Unfortunately, the motion that was passed that allowed for hiring the new contractor was not phrased to be a continually funded position. This position is vital to the Commission's continuing success with its reporting applications. The Commission requests that this position become a part of permanent, ongoing supplies and services funding. This position costs the Commission \$149,760 per year.

Additionally, the Commission will need to replace current staff's monitors and renew software licensing during the upcoming biennium. These items are anticipated to cost \$15,000.

# Decision Item by Line

2527 Biennial Budget

<b>DEPARTMENT</b>	<b>CODES</b>	<b>TITLES</b>
	521	Ethics Commission

<b>DECISION ITEM</b>	<b>CODES</b>	<b>TITLES</b>
	4002	Other IT Needs

	<b>Expenditure Items</b>	<b>1st Year Cost</b>	<b>2nd Year Cost</b>
01	Permanent Position Salaries	\$0	\$0
02	Turnover	\$0	\$0
03	Project Position Salaries	\$0	\$0
04	LTE/Misc. Salaries	\$0	\$0
05	Fringe Benefits	\$0	\$0
06	Supplies and Services	\$149,800	\$149,800
07	Permanent Property	\$0	\$0
08	Unallotted Reserve	\$0	\$0
09	Aids to Individuals & Organizations	\$0	\$0
10	Local Assistance	\$0	\$0
11	One-time Financing	\$15,000	\$0
12	Debt service	\$0	\$0
13		\$0	\$0
14		\$0	\$0
15		\$0	\$0
16		\$0	\$0
<b>17</b>	<b>TOTAL</b>	<b>\$164,800</b>	<b>\$149,800</b>
18	Project Positions Authorized	0.00	0.00
19	Classified Positions Authorized	0.00	0.00
20	Unclassified Positions Authorized	0.00	0.00

# Decision Item by Numeric

2527 Biennial Budget

## Ethics Commission

Program	Decision Item/Numeric	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
	<b>4002 Other IT Needs</b>				
01	Ethics, campaign finance and lobbying regulation				
	01 General program ops; GPR	\$164,800	\$149,800	0.00	0.00
	<b>Ethics, campaign finance and lobbying regulation Sub Total</b>	<b>\$164,800</b>	<b>\$149,800</b>	<b>0.00</b>	<b>0.00</b>
	<b>Other IT Needs Sub Total</b>	<b>\$164,800</b>	<b>\$149,800</b>	<b>0.00</b>	<b>0.00</b>
	<b>Agency Total</b>	<b>\$164,800</b>	<b>\$149,800</b>	<b>0.00</b>	<b>0.00</b>

# Decision Item by Fund Source

2527 Biennial Budget

## Ethics Commission

Decision Item/Source of Funds		1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
<b>4002 Other IT Needs</b>					
GPR	S	\$164,800	\$149,800	0.00	0.00
<b>Other IT Needs Total</b>		<b>\$164,800</b>	<b>\$149,800</b>	<b>0.00</b>	<b>0.00</b>
<b>Agency Total</b>		<b>\$164,800</b>	<b>\$149,800</b>	<b>0.00</b>	<b>0.00</b>

**Decision Item (DIN) - 4003**

**Decision Item (DIN) Title - Ending Reliance on Lobbying Program Revenue**

**NARRATIVE**

See the attached narrative.

## **DIN 4003: Lobbying Program Revenue**

There are two concerns with the Lobbying Program Revenue that the Commission seeks to address. First, the Commission believes that funding staff with Lobbying Program Revenue creates a significant conflict of interest which should be remedied. Second, current informal projections show that the fees will not continue to generate enough revenue at existing levels to maintain current staffing levels.

As to the former, the Commission acknowledges that program revenue can be a useful tool to reduce reliance on general purpose revenue. This is especially true for programs like drivers licenses, vehicle registration and plates, hunting licenses, and other areas where the person paying the fee is not actively regulated by the agency collecting those fees. In the case of the Commission, there is significantly more regulation involved. The Commission is charged not just with issuing lobbyists licenses and registering principals, the Commission also must from time to time determine whether a lobbyist's license or principal registrations must be suspended or revoked. Further, the Commission actively audits for compliance with registration and reporting requirements as well as timeliness of reports. Whether a violation has occurred, or whether it should be excused due to the circumstances, is an exercise of discretion by the Commission and, where appropriately delegated, the Commission's staff. The Commission believes that using lobbying fees to pay the staff who actively regulate the lobbying community creates a very strong appearance of a conflict of interest, if not an actual conflict of interest.

As to the latter, informal projections indicate that the fees will not continue to generate enough revenue at existing levels to maintain current staffing levels. These informal projections show that the deficiency will occur sometime in the next two to four years. The fees paid by lobbyists and principals are established in statute and, therefore, can only be changed through legislative action. There are a couple of ways to avoid this deficiency. First, the Legislature could increase the fees paid by lobbyists and/or principals. However, this appears unlikely. There are several reasons for this: The fees are set by statute. Therefore, they can only be changed by the Legislature. The fees for principal registration increased effective July 1, 2021. It seems unlikely that another change would be supported so soon after that change. The fee for a lobbyist license has not changed in more than a decade. However, the lobbying community would likely strongly oppose a fee increase. Additionally, a report produced by the National Conference of State

Legislatures (“NCSL”) in 2021 indicates that, of the states that set their fees by statute, Wisconsin’s lobbyist license fee is among the higher fees across the country.

The second alternative to address the conflict of interest and anticipated shortfall in lobbying program revenue is to fund the Commission’s necessary positions and supplies and services using general purpose revenue. Under this alternative, the Commission would continue to collect the fees from the lobbying community and then lapsing those funds to the general revenue fund.

In light of the concerns above, the Commission is requesting that the Legislature end the Commission’s reliance on lobbying program revenue for staff, supplies, and services and asks the Legislature to provide sufficient funding for those needs through General Purpose Revenue. If done, the Commission would continue to collect the principal registration and licensing fees established in s. 13.75; however, the funds collected would lapse to the General Revenue Fund. Statutory language changes to the relevant appropriation would be required to meet this request.



# Decision Item by Line

2527 Biennial Budget

<b>DEPARTMENT</b>	<b>CODES</b>	<b>TITLES</b>
	521	Ethics Commission

<b>DECISION ITEM</b>	<b>CODES</b>	<b>TITLES</b>
	4003	Ending Reliance on Lobbying Program Revenue

	<b>Expenditure Items</b>	<b>1st Year Cost</b>	<b>2nd Year Cost</b>
01	Permanent Position Salaries	\$0	\$0
02	Turnover	\$0	\$0
03	Project Position Salaries	\$0	\$0
04	LTE/Misc. Salaries	\$0	\$0
05	Fringe Benefits	\$0	\$0
06	Supplies and Services	\$0	\$0
07	Permanent Property	\$0	\$0
08	Unallotted Reserve	\$0	\$0
09	Aids to Individuals & Organizations	\$0	\$0
10	Local Assistance	\$0	\$0
11	One-time Financing	\$0	\$0
12	Debt service	\$0	\$0
13		\$0	\$0
14		\$0	\$0
15		\$0	\$0
16		\$0	\$0
<b>17</b>	<b>TOTAL</b>	<b>\$0</b>	<b>\$0</b>
18	Project Positions Authorized	0.00	0.00
19	Classified Positions Authorized	0.00	0.00
20	Unclassified Positions Authorized	0.00	0.00

# Decision Item by Numeric

2527 Biennial Budget

## Ethics Commission

Program	Decision Item/Numeric	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
	<b>4003 Ending Reliance on Lobbying Program Revenue</b>				
01	Ethics, campaign finance and lobbying regulation				
	01 General program ops; GPR	\$511,900	\$511,900	3.30	3.30
	23 Lobbying admin; PR	(\$511,900)	(\$511,900)	(3.30)	(3.30)
	<b>Ethics, campaign finance and lobbying regulation Sub Total</b>	<b>\$0</b>	<b>\$0</b>	<b>0.00</b>	<b>0.00</b>
	<b>Ending Reliance on Lobbying Program Revenue Sub Total</b>	<b>\$0</b>	<b>\$0</b>	<b>0.00</b>	<b>0.00</b>
	<b>Agency Total</b>	<b>\$0</b>	<b>\$0</b>	<b>0.00</b>	<b>0.00</b>

# Decision Item by Fund Source

2527 Biennial Budget

## Ethics Commission

Decision Item/Source of Funds		1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
<b>4003 Ending Reliance on Lobbying Program Revenue</b>					
PR	S	(\$511,900)	(\$511,900)	(3.30)	(3.30)
GPR	S	\$511,900	\$511,900	3.30	3.30
<b>Ending Reliance on Lobbying Program Revenue Total</b>		<b>\$0</b>	<b>\$0</b>	<b>0.00</b>	<b>0.00</b>
<b>Agency Total</b>		<b>\$0</b>	<b>\$0</b>	<b>0.00</b>	<b>0.00</b>

# ACT 201

Proposal under s. 16.42(4)(b): **0% change in each fiscal year**

FY: **FY26**  
 Agency: **Ethics - 521**

Exclude: Federal  
 Debt Service

Columns A-G were prepopulated for agencies to reflect state operations adjusted base and reductions agreed to by DOA and LFB. See Appendix H for instructions on how to complete these templates.

**Proposed \$ and Proposed FTE columns reflect total agency proposed spending and positions for indicated fiscal year. These amounts should include standard budget adjustments (SBAs), any proposed reallocations or reductions to meet the target, and any other requests that the agency would want considered under this proposal.**

Appropriations with zero dollars and zero FTEs are not loaded into the template. If you have any questions, contact your SBO analyst.

**IF YOUR AGENCY PLANS TO TAKE THE SAME CUTS OVER BOTH YEARS, YOU SHOULD ONLY FILL OUT ONE GRID FOR 0% GROWTH AND ONE GRID FOR 5% REDUCTION, THEN CHANGE "FY26" TO "FY26 AND 27".**

Agency	Appropriation		Fund Source	\$	FTE	(See Note 1) 0% Change Target	Proposed Budget 2025-26			Change from Adj Base		(See Note 2) Remove SBAs		Change from Adj Base after Removal of SBAs	
	Alpha	Numeric					Proposed \$	Proposed FTE	Item Ref	\$	FTE	\$	FTE	\$	FTE
521	1a	101	GPR	\$808,900.00	4.70	\$0	\$812,700	4.70		\$3,800	0.00	(\$3,800)	0.00	\$0	0.00
521	1be	105	GPR	\$225,000.00	0.00	\$0	\$225,000	0.00		\$0	0.00	\$0	0.00	\$0	0.00
521	1g	120	PR	\$31,700.00	0.00	\$0	\$31,700	0.00		\$0	0.00	\$0	0.00	\$0	0.00
521	1i	122	PR	\$4,500.00	0.00	\$0	\$4,500	0.00		\$0	0.00	\$0	0.00	\$0	0.00
521	1im	123	PR	\$507,000.00	3.30	\$0	\$511,900	3.30		\$4,900	0.00	(\$4,900)	0.00	\$0	0.00
<b>Totals</b>				<b>\$1,577,100.00</b>	<b>8.00</b>	<b>\$0</b>	<b>\$1,585,800</b>	<b>8.00</b>		<b>\$8,700</b>	<b>0.00</b>	<b>(\$8,700)</b>	<b>0.00</b>	<b>\$0</b>	<b>0.00</b>

Note 1: Reduction target must be met within state operations appropriations, but may be allocated across those appropriations and fund sources.

Note 2: Amounts should be SBAs (DINs 3001 - 3011) from agency request multiplied by -1.

Target Reduction = \$0

Difference = **\$0**  
 Should equal \$0

**Items - Describe proposed changes (excl. SBAs) to reach target or other priorities of agency**

- The passage of 2023 Wisconsin Act 126 requires local candidates and other local committees to register and report with the Commission. As a result, the Commission will be assuming the workload that is currently done by 2,345 people. The Commission will be unable to do so without passage of the DINs. Further, The Commission may not be able to maintain or operate its campaign finance, lobbying, and SEI reporting websites. This would result in the public being deprived of transparent disclosure relating to campaign finance, lobbying, and personal interests of officials.

**ACT 201**

Proposal under s. 16.42(4)(b): **5% change in each fiscal year**

FY: **FY26**

Agency: **Ethics - 521**

Exclude: Federal  
Debt Service

Columns A-G were prepopulated for agencies to reflect state operations adjusted base and reductions agreed to by DOA and LFB. See Appendix H for instructions on how to complete these templates.

**Proposed \$ and Proposed FTE columns reflect total agency proposed spending and positions for indicated fiscal year. These amounts should include standard budget adjustments (SBAs), any proposed reallocations or reductions to meet the target, and any other requests that the agency would want considered under this proposal.**

Appropriations with zero dollars and zero FTEs are not loaded into the template. If you have any questions, contact your SBO analyst.

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Agency	Appropriation		Fund Source	\$	FTE	(See Note 1) 5% Change Target	Proposed Budget 2025-26		Item Ref	Change from Adj Base		(See Note 2) Remove SBAs		Change from Adj Base after Removal of SBAs	
	Alpha	Numeric					Proposed \$	Proposed FTE		\$	FTE	\$	FTE	\$	FTE
521	1a	101	GPR	\$808,900.00	4.70	(\$40,400)	812,700	4.70		\$3,800	0.00	(\$3,800)	0.00	\$0	0.00
521	1be	105	GPR	\$225,000.00	0.00	(\$11,300)	195,000	0.00		(\$30,000)	0.00	\$0	0.00	(\$30,000)	0.00
521	1g	120	PR	\$31,700.00	0.00	(\$1,600)	31,700	0.00		\$0	0.00	\$0	0.00	\$0	0.00
521	1i	122	PR	\$4,500.00	0.00	(\$200)	2,000	0.00		(\$2,500)	0.00	\$0	0.00	(\$2,500)	0.00
521	1im	123	PR	\$507,000.00	3.30	(\$25,400)	465,500	3.30		(\$41,500)	0.00	(\$4,900)	0.00	(\$46,400)	0.00
<b>Totals</b>				<b>\$1,577,100.00</b>	<b>8.00</b>	<b>(\$78,900)</b>	<b>\$1,506,900</b>	<b>8.00</b>		<b>(\$70,200)</b>	<b>0.00</b>	<b>(\$8,700)</b>	<b>0.00</b>	<b>(\$78,900)</b>	<b>0.00</b>

Note 1: Reduction target must be met within state operations appropriations, but may be allocated across those appropriations and fund sources.

Note 2: Amounts should be SBAs (DINs 3001 - 3011) from agency request multiplied by -1.

Target Reduction = (\$78,900)

Difference = **\$0**  
Should equal \$0

**Items - Describe proposed changes (excl. SBAs) to reach target or other priorities of agency**

- Reduces Supplies & Services by \$30,000; this reduction may inhibit the ability for the Commission Staff and/or outside Counsel to conduct investigations as authorized by the Commissioners.
- Reduces Supplies & Services by \$2,000; reduction in spending authority may inhibit the ability of the Commission to cover all costs associated with records requests with program revenue, which would negatively impact GPR appropriations.
- The passage of 2023 Wisconsin Act 126 requires local candidates and other local committees to register and report with the Commission. As a result, the Commission will be assuming the workload that is currently done by 2,345 people. The Commission will be unable to do so without passage of the DINs. Further, The Commission may not be able to maintain or operate its campaign finance, lobbying, and SEI reporting websites. This would result in the public being deprived of transparent disclosure relating to campaign finance, lobbying, and personal interests of officials.

**ACT 201**

Proposal under s. 16.42(4)(b): **0% change in each fiscal year**

FY: **FY27**

Agency: **Ethics - 521**

Exclude: Federal  
Debt Service

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Agency	Appropriation		Fund Source	\$	FTE	(See Note 1) 0% Change Target	Proposed Budget 2026-27		Item Ref	Change from Adj Base		(See Note 2) Remove SBAs		Change from Adj Base after Removal of SBAs	
	Alpha	Numeric					Proposed \$	Proposed FTE		\$	FTE	\$	FTE	\$	FTE
521	1a	101	GPR	\$808,900.00	4.70	\$0	\$812,700	4.70		\$3,800	0.00	(\$3,800)	0.00	\$0	0.00
521	1be	105	GPR	\$225,000.00	0.00	\$0	\$225,000	0.00		\$0	0.00	\$0	0.00	\$0	0.00
521	1g	120	PR	\$31,700.00	0.00	\$0	\$31,700	0.00		\$0	0.00	\$0	0.00	\$0	0.00
521	1i	122	PR	\$4,500.00	0.00	\$0	\$4,500	0.00		\$0	0.00	\$0	0.00	\$0	0.00
521	1im	123	PR	\$507,000.00	3.30	\$0	\$511,900	3.30		\$4,900	0.00	(\$4,900)	0.00	\$0	0.00
<b>Totals</b>				<b>\$1,577,100.00</b>	<b>8.00</b>	<b>\$0</b>	<b>\$1,585,800</b>	<b>8.00</b>		<b>\$8,700</b>	<b>0.00</b>	<b>(\$8,700)</b>	<b>0.00</b>	<b>\$0</b>	<b>0.00</b>

Note 1: Reduction target must be met within state operations appropriations, but may be allocated across those appropriations and fund sources.

Target Reduction = \$0

Note 2: Amounts should be SBAs (DINs 3001 - 3011) from agency request multiplied by -1.

Difference = **\$0**  
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<sup>1</sup> The passage of 2023 Wisconsin Act 126 requires local candidates and other local committees to register and report with the Commission. As a result, the Commission will be assuming the workload that is currently done by 2,345 people. The Commission will be unable to do so without passage of the DINs. Further, The Commission may not be able to maintain or operate its campaign finance, lobbying, and SEI reporting websites. This would result in the public being deprived of transparent disclosure relating to campaign finance, lobbying, and personal interests of officials.

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FY: **FY27**

Agency: **Ethics - 521**

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Debt Service

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	Alpha	Numeric					Proposed \$	Proposed FTE		\$	FTE	\$	FTE	\$	FTE
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521	1g	120	PR	\$31,700.00	0.00	(\$1,600)	31,700	0.00		\$0	0.00	\$0	0.00	\$0	0.00
521	1i	122	PR	\$4,500.00	0.00	(\$200)	2,000	0.00		(\$2,500)	0.00	\$0	0.00	(\$2,500)	0.00
521	1im	123	PR	\$507,000.00	3.30	(\$25,400)	465,500	3.30		(\$41,500)	0.00	(\$4,900)	0.00	(\$46,400)	0.00
<b>Totals</b>				<b>\$1,577,100.00</b>	<b>8.00</b>	<b>(\$78,900)</b>	<b>\$1,506,900</b>	<b>8.00</b>		<b>(\$70,200)</b>	<b>0.00</b>	<b>(\$8,700)</b>	<b>0.00</b>	<b>(\$78,900)</b>	<b>0.00</b>

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Should equal \$0

**Items - Describe proposed changes (excl. SBAs) to reach target or other priorities of agency**

- Reduces Supplies & Services by \$30,000; this reduction may inhibit the ability for the Commission Staff and/or outside Counsel to conduct investigations as authorized by the Commissioners.
- Reduces Supplies & Services by \$2,000; reduction in spending authority may inhibit the ability of the Commission to cover all costs associated with records requests with program revenue, which would negatively impact GPR appropriations.
- The passage of 2023 Wisconsin Act 126 requires local candidates and other local committees to register and report with the Commission. As a result, the Commission will be assuming the workload that is currently done by 2,345 people. The Commission will be unable to do so without passage of the DINs. Further, The Commission may not be able to maintain or operate its campaign finance, lobbying, and SEI reporting websites. This would result in the public being deprived of transparent disclosure relating to campaign finance, lobbying, and personal interests of officials.