State of Wisconsin

Ethics Commission

Agency Budget Request
2027 – 2029 Biennium
September 15, 2026

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Wisconsin Ethics Commission

Campaign Finance | Lobbying | Ethics
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September 15, 2026

Kathy Blumenfeld, Secretary
Wisconsin Department of Administration
101 E. Wilson St., 10th 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 2027 – 29 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 Carlton, Jr.
Commission Administrator
Wisconsin Ethics Commission

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

2025 AND 2026 GOALS AND ACTUALS

Prog. No.	Performance Measure	Goal 2025	Actual 2025	Goal 2026	Actual 2026
1.	Percentage of fees received by electronic payment methods.	95%	93.8%[1]	95%	98%[1]
1.	Percentage of campaign finance reports filed on or before the required date.	96%	90.2%[2]	96%	78.3%[1]
1.	Percentage of committees in compliance, based on audit findings.	95%	90.4%	95%	99.5%
1.	Percentage of lobbyist time reports completed on or before the required date.	99%	99.5%	99%	97.1%
1.	Percentage of registered principals completing their Statements of Lobbying Activities and Expenditures on or before the required date.	99%	97.5%	99%	97.3%
1.	Percentage of principals in compliance, based on audit findings.	99%	99%	99%	98.4%
1.	Percentage of required Statements of Economic Interest filed on or before the required date.	96%	96.2%	96%	96.7%
1.	Statements of Economic Interest filed electronically.	96%	98.7%	96%	99.8%

Note: Based on fiscal year.

[1]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. Lobbying program only.

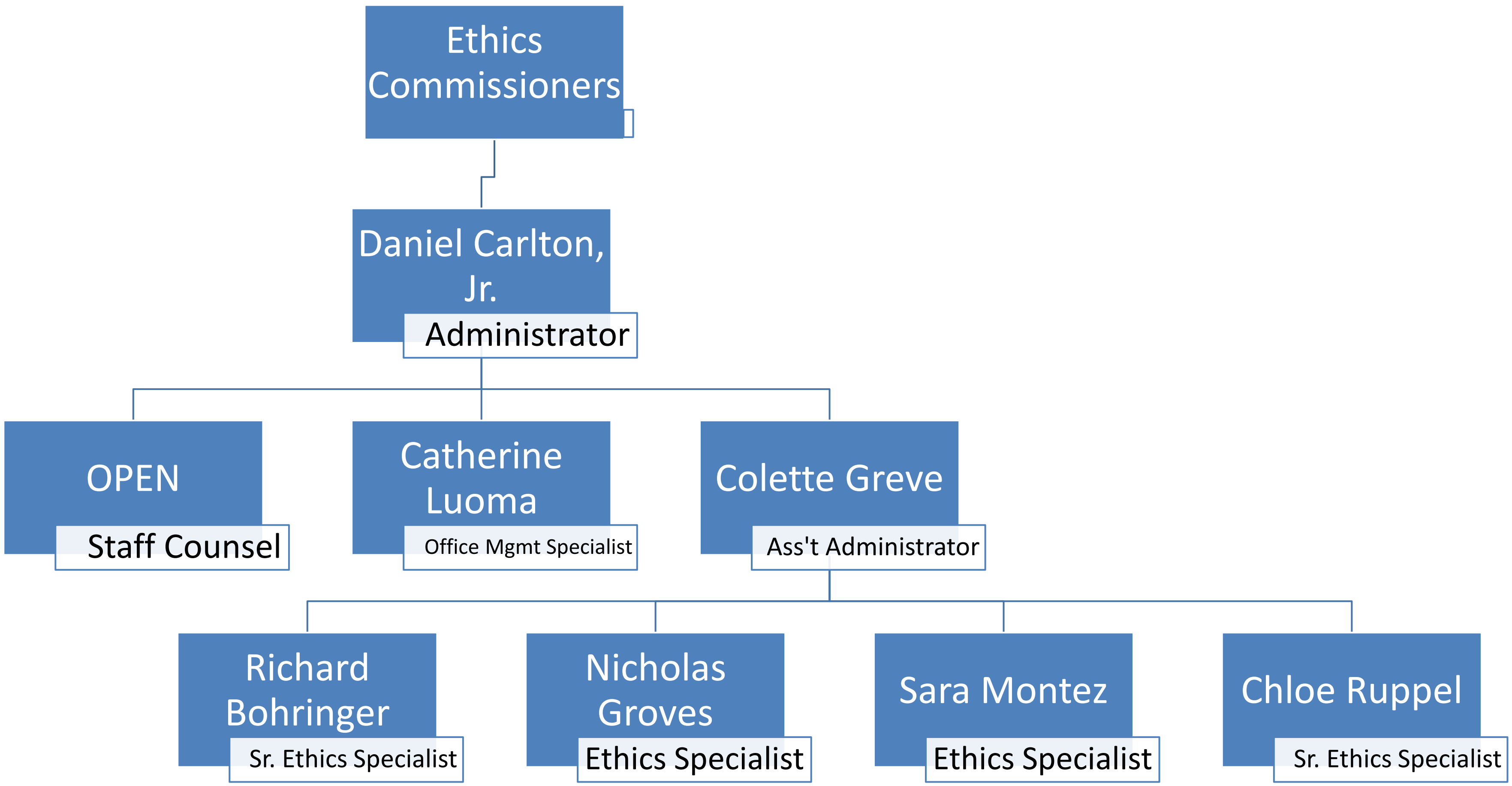
[2]The Commission's notification process has not changed. The Commission typically provides notice of an upcoming filing deadline several times before the due date, including a reminder on the due date. Ultimately, it is the registrant's responsibility to file their required reports on time. This performance metric was also impacted by implementing statutory clarification that exemption can only be claimed on an annual basis. A number of committees had previously been exempt without renewing exemption annually. The new campaign finance website properly lapsed their exemption and, despite notice, many of them did not file. Additionally, some registrants were not administratively terminated until after the due date for the 2026 January Continuing Report, further impacting these numbers.

2027, 2028 AND 2029 GOALS

Prog. No.	Performance Measure	Goal 2027	Goal 2028	Goal 2029
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

		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	$935,688	$1,059,500	$4,392,300	$4,203,500	27.00	27.00	$2,119,000	$8,595,800	$6,476,800	305.70%
Total		$935,688	$1,059,500	$4,392,300	$4,203,500	27.00	27.00	$2,119,000	$8,595,800	$6,476,800	305.70%
PR	S	$563,237	$564,400	$71,200	$71,200	0.00	0.00	$1,128,800	$142,400	($986,400)	-87.40%
Total		$563,237	$564,400	$71,200	$71,200	0.00	0.00	$1,128,800	$142,400	($986,400)	-87.40%
Grand Total		$1,498,925	$1,623,900	$4,463,500	$4,274,700	27.00	27.00	$3,247,800	$8,738,200	$5,490,400	169.00%

Agency Total by Program

		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 %
01 Ethics, campaign finance and lobbying regulation											
Non Federal											
GPR		**$935,688**	**$1,059,500**	**$4,392,300**	**$4,203,500**	**27.00**	**27.00**	**$2,119,000**	**$8,595,800**	**$6,476,800**	**305.65%**
	S	$935,688	$1,059,500	$4,392,300	$4,203,500	27.00	27.00	$2,119,000	$8,595,800	$6,476,800	305.65%
PR		**$563,237**	**$564,400**	**$71,200**	**$71,200**	**0.00**	**0.00**	**$1,128,800**	**$142,400**	**($986,400)**	**-87.38%**
	S	$563,237	$564,400	$71,200	$71,200	0.00	0.00	$1,128,800	$142,400	($986,400)	-87.38%
Total - Non Federal		**$1,498,925**	**$1,623,900**	**$4,463,500**	**$4,274,700**	**27.00**	**27.00**	**$3,247,800**	**$8,738,200**	**$5,490,400**	**169.05%**
	S	$1,498,925	$1,623,900	$4,463,500	$4,274,700	27.00	27.00	$3,247,800	$8,738,200	$5,490,400	169.05%
PGM 01 Total		**$1,498,925**	**$1,623,900**	**$4,463,500**	**$4,274,700**	**27.00**	**27.00**	**$3,247,800**	**$8,738,200**	**$5,490,400**	**169.05%**
GPR		**$935,688**	**$1,059,500**	**$4,392,300**	**$4,203,500**	**27.00**	**27.00**	**$2,119,000**	**$8,595,800**	**$6,476,800**	**305.65%**
	S	$935,688	$1,059,500	$4,392,300	$4,203,500	27.00	27.00	$2,119,000	$8,595,800	$6,476,800	305.65%
PR		**$563,237**	**$564,400**	**$71,200**	**$71,200**	**0.00**	**0.00**	**$1,128,800**	**$142,400**	**($986,400)**	**-87.38%**
	S	$563,237	$564,400	$71,200	$71,200	0.00	0.00	$1,128,800	$142,400	($986,400)	-87.38%
TOTAL 01		**$1,498,925**	**$1,623,900**	**$4,463,500**	**$4,274,700**	**27.00**	**27.00**	**$3,247,800**	**$8,738,200**	**$5,490,400**	**169.05%**
	S	$1,498,925	$1,623,900	$4,463,500	$4,274,700	27.00	27.00	$3,247,800	$8,738,200	$5,490,400	169.05%

Agency Total by Program

AGENCY TOTAL	$1,498,925	$1,623,900	$4,463,500	$4,274,700	27.00	27.00	$3,247,800	$8,738,200	$5,490,400	169.05%

Agency Total by Decision Item

Decision Item	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
2000 Adjusted Base Funding Level	$1,623,900	$1,623,900	8.00	8.00
3003 Full Funding of Continuing Position Salaries and Fringe Benefits	($36,400)	($36,400)	0.00	0.00
3010 Full Funding of Lease and Directed Moves Costs	$2,800	$2,800	0.00	0.00
4001 Existing Position Salary Changes	$72,400	$72,400	0.00	0.00
4002 Commissioner Per Diems and Other Meeting Costs	$3,300	$3,300	0.00	0.00
4003 Lobbying Program Revenue	$0	$0	0.00	0.00
4004 Continuing Support for Sunshine (Campaign Finance Information System) & IT/Office Supply Needs for Existing Staff	$343,400	$319,100	0.00	0.00
4005 Additional Attorney and Financial Specialist	$205,500	$240,200	2.00	2.00
4006 Implementation of 2023 Wisconsin Act 126	$2,073,200	$2,009,000	17.00	17.00
7900 Technology Improvements to Enhance Cybersecurity	$168,600	$33,600	0.00	0.00
7910 Central Services Adjustments	$6,800	$6,800	0.00	0.00
TOTAL	**$4,463,500**	**$4,274,700**	**27.00**	**27.00**

GPR Earned

Program: 01 - Ethics, campaign finance and lobbying regulation

Date:

Revenue	Prior Year Actuals	Base Year Estimate	1st Year Estimate	2nd Year Estimate
Opening Balance	$0	$0	$452,300	$750,000
TOTAL	**$0**	**$0**	**$452,300**	**$750,000**

Program Revenue

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
Opening Balance	**$270,349**	**$196,500**	**$112,500**	**$80,800**
Collected Revenue	$29,608	$35,000	$35,000	$35,000
Total Revenue	**$299,957**	**$231,500**	**$147,500**	**$115,800**
Expenditures	**$103,462**	**$119,000**	**$0**	**$0**
2000 Adjusted Base Funding Level	$0	$0	$31,700	$31,700
4001 Existing Position Salary Changes	$0	$0	$35,000	$35,000
Total Expenditures	**$103,462**	**$119,000**	**$66,700**	**$66,700**
Closing Balance	**$196,495**	**$112,500**	**$80,800**	**$49,100**

Program Revenue

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

Program: 01 - Ethics, campaign finance and lobbying regulation

SubProgram: -

Numeric Appropriation: 22 - Materials and services

Revenue and Expenditures	Prior Year Actuals	Base Year Estimate	1st Year Estimate	2nd Year Estimate
Opening Balance	**$2,019**	**$2,100**	**$2,100**	**($2,400)**
Total Revenue	**$2,019**	**$2,100**	**$2,100**	**($2,400)**
Expenditures	**$0**	**$0**	**$0**	**$0**
2000 Adjusted Base Funding Level	$0	$0	$4,500	$4,500
Total Expenditures	**$0**	**$0**	**$4,500**	**$4,500**
Closing Balance	**$2,019**	**$2,100**	**($2,400)**	**($6,900)**

Program Revenue

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
Opening Balance	**$379,902**	**$47,300**	**$327,300**	**$0**
Collected Revenue	$127,093	$750,000	$125,000	$750,000
Total Revenue	**$506,995**	**$797,300**	**$452,300**	**$750,000**
Expenditures	**$459,775**	**$470,000**	**$0**	**$0**
2000 Adjusted Base Funding Level	$0	$0	$528,200	$528,200
3003 Full Funding of Continuing Position Salaries and Fringe Benefits	$0	$0	($17,500)	($17,500)
4001 Existing Position Salary Changes	$0	$0	$18,700	$18,700
4003 Lobbying Program Revenue	$0	$0	($529,400)	($529,400)
Transfer to General Fund	$0	$0	$452,300	$750,000
Total Expenditures	**$459,775**	**$470,000**	**$452,300**	**$750,000**
Closing Balance	**$47,220**	**$327,300**	**$0**	**$0**

Decision Item (DIN): 2000 - Adjusted Base Funding Level

NARRATIVE

Adjusted Base Funding Level

Decision Item by Line

Decision Item (DIN): 2000 - Adjusted Base Funding Level

Line Number	Expenditure Items	1st Year Cost	2nd Year Cost
01	Permanent Position Salaries	$680,000	$680,000
02	Turnover	$0	$0
03	Project Position Salaries	$0	$0
04	LTE/Misc. Salaries	$3,800	$3,800
05	Fringe Benefits	$240,200	$240,200
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
17	**TOTAL**	**$1,623,900**	**$1,623,900**
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

Program: 01 - Ethics, campaign finance and lobbying regulation

Decision Item (DIN): 2000 - Adjusted Base Funding Level

Numeric	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
01 - General program ops; GPR	$834,500	$834,500	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	$528,200	$528,200	3.30	3.30
Program Sub Total	**$1,623,900**	**$1,623,900**	**8.00**	**8.00**
DIN 2000 - Adjusted Base Funding Level Total	**$1,623,900**	**$1,623,900**	**8.00**	**8.00**
Agency Total	**$1,623,900**	**$1,623,900**	**8.00**	**8.00**

Decision Item by Fund Source

Decision Item (DIN): 2000 - Adjusted Base Funding Level

Source of Funds	Type	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
GPR	S	$1,059,500	$1,059,500	4.70	4.70
PR	S	$564,400	$564,400	3.30	3.30
DIN 2000 - Adjusted Base Funding Level Total		**$1,623,900**	**$1,623,900**	**8.00**	**8.00**
Agency Total		**$1,623,900**	**$1,623,900**	**8.00**	**8.00**

Decision Item (DIN): 3003 - 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

Decision Item (DIN): 3003 - Full Funding of Continuing Position Salaries and Fringe Benefits

Line Number	Expenditure Items	1st Year Cost	2nd Year Cost
01	Permanent Position Salaries	($36,400)	($36,400)
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
17	**TOTAL**	**($36,400)**	**($36,400)**
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

Program: 01 - Ethics, campaign finance and lobbying regulation

Decision Item (DIN): 3003 - Full Funding of Continuing Position Salaries and Fringe Benefits

Numeric	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
01 - General program ops; GPR	($18,900)	($18,900)	0.00	0.00
23 - Lobbying admin; PR	($17,500)	($17,500)	0.00	0.00
Program Sub Total	**($36,400)**	**($36,400)**	**0.00**	**0.00**
DIN 3003 - Full Funding of Continuing Position Salaries and Fringe Benefits Total	**($36,400)**	**($36,400)**	**0.00**	**0.00**
Agency Total	**($36,400)**	**($36,400)**	**0.00**	**0.00**

Decision Item by Fund Source

Decision Item (DIN): 3003 - Full Funding of Continuing Position Salaries and Fringe Benefits

Source of Funds	Type	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
GPR	S	($18,900)	($18,900)	0.00	0.00
PR	S	($17,500)	($17,500)	0.00	0.00
DIN 3003 - Full Funding of Continuing Position Salaries and Fringe Benefits Total		**($36,400)**	**($36,400)**	**0.00**	**0.00**
Agency Total		**($36,400)**	**($36,400)**	**0.00**	**0.00**

Decision Item (DIN): 3010 - Full Funding of Lease and Directed Moves Costs

NARRATIVE

Standard Budget Adjustment - Full Funding of Lease and Directed Moves Costs

Decision Item by Line

Decision Item (DIN): 3010 - Full Funding of Lease and Directed Moves Costs

Line Number	Expenditure Items	1st Year Cost	2nd Year Cost
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	$2,800	$2,800
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	$0	$0
12	Debt service	$0	$0
13		$0	$0
14		$0	$0
15		$0	$0
16		$0	$0
17	**TOTAL**	**$2,800**	**$2,800**
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

Program: 01 - Ethics, campaign finance and lobbying regulation

Decision Item (DIN): 3010 - Full Funding of Lease and Directed Moves Costs

Numeric	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
01 - General program ops; GPR	$2,800	$2,800	0.00	0.00
Program Sub Total	**$2,800**	**$2,800**	**0.00**	**0.00**
DIN 3010 - Full Funding of Lease and Directed Moves Costs Total	**$2,800**	**$2,800**	**0.00**	**0.00**
Agency Total	**$2,800**	**$2,800**	**0.00**	**0.00**

Decision Item by Fund Source

Decision Item (DIN): 3010 - Full Funding of Lease and Directed Moves Costs

Source of Funds	Type	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
GPR	S	$2,800	$2,800	0.00	0.00
DIN 3010 - Full Funding of Lease and Directed Moves Costs Total		**$2,800**	**$2,800**	**0.00**	**0.00**
Agency Total		**$2,800**	**$2,800**	**0.00**	**0.00**

Decision Item (DIN): 4001 - Existing Position Salary Changes

NARRATIVE

See attached document.

DIN 4001: Existing Position Salary Changes

The Commission is requesting additional authority to fund the increased salary and fringe for the current attorney position and additional authority for increased salary and fringe for the Commission's Administrator and Assistant Administrator.

<u>Increased Funding for Existing Attorney Position</u>

Recently, the Commission's attorney resigned to take another position. After an exhaustive recruitment, the Commission has hired a replacement. This replacement has significantly more legal experience, especially in the realm of litigation, than the predecessor had. As a result, the salary commanded by this excellent candidate was higher than the previous attorney's salary. The previous attorney was paid $47.47 per hour. The new attorney is being paid $53.99 per hour. As a result, the Commission will need $13,652 dollars per year for the new attorney's salary. Additionally, the Commission will need $5,054 dollars per year for the difference in fringe costs. The funding for this position is split 50-50 between lobbying program revenue and GPR.

<u>Administrator and Assistant Administrator Salaries</u>

The Commission is very satisfied with the performance of its Administrator and Assistant Administrator. Additionally, the Commission has recently become aware that individuals in other similar agencies are earning significantly more than the Commission's Administrator and Assistant Administrator. Unlike the Commission's Administrator and Assistant Administrator, these comparable individuals are not licensed to practice law. Moreover, given the additional workload and supervisory responsibilities required as a result of implementing 2023 Wisconsin Act 126, the Commission believes that the salaries for these two positions needs to be increased. The Commission has sufficient funding available in Campaign Finance Program Revenue to fund these increases. Therefore, the Commission is requesting authority to spend an additional $35,000 per year in salary and fringe costs for the Administrator and Assistant Administrator to be funded from the Commission's Campaign Finance Program Revenue.

Decision Item by Line

Decision Item (DIN): 4001 - Existing Position Salary Changes

Line Number	Expenditure Items	1st Year Cost	2nd Year Cost
01	Permanent Position Salaries	$62,000	$62,000
02	Turnover	$0	$0
03	Project Position Salaries	$0	$0
04	LTE/Misc. Salaries	$0	$0
05	Fringe Benefits	$10,400	$10,400
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
17	**TOTAL**	**$72,400**	**$72,400**
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

Program: 01 - Ethics, campaign finance and lobbying regulation

Decision Item (DIN): 4001 - Existing Position Salary Changes

Numeric	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
01 - General program ops; GPR	$18,700	$18,700	0.00	0.00
20 - General program operations; PR	$35,000	$35,000	0.00	0.00
23 - Lobbying admin; PR	$18,700	$18,700	0.00	0.00
Program Sub Total	**$72,400**	**$72,400**	**0.00**	**0.00**
DIN 4001 - Existing Position Salary Changes Total	**$72,400**	**$72,400**	**0.00**	**0.00**
Agency Total	**$72,400**	**$72,400**	**0.00**	**0.00**

Decision Item by Fund Source

Decision Item (DIN): 4001 - Existing Position Salary Changes

Source of Funds	Type	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
GPR	S	$18,700	$18,700	0.00	0.00
PR	S	$53,700	$53,700	0.00	0.00
DIN 4001 - Existing Position Salary Changes Total		**$72,400**	**$72,400**	**0.00**	**0.00**
Agency Total		**$72,400**	**$72,400**	**0.00**	**0.00**

Decision Item (DIN): 4002 - Commissioner Per Diems and Other Meeting Costs

NARRATIVE

See attached document.

DIN 4002: Commissioner Per Diems and Other Meeting Costs

The Wisconsin Ethics Commission meets in person in Madison, Wisconsin. In the past, the Commission has budgeted for 4-5 meetings per year. However, the Commission has typically met between several additional times per year. To properly budget for the meetings, the Commission seeks to budget for 3 additional meetings per year. Additionally, one of the Commissioners requires a hotel to attend the meetings. The Commission seeks sufficient funding to provide the Commissioner a hotel room for the meetings.

Decision Item by Line

Decision Item (DIN): 4002 - Commissioner Per Diems and Other Meeting Costs

Line Number	Expenditure Items	1st Year Cost	2nd Year Cost
01	Permanent Position Salaries	$0	$0
02	Turnover	$0	$0
03	Project Position Salaries	$0	$0
04	LTE/Misc. Salaries	$2,100	$2,100
05	Fringe Benefits	$0	$0
06	Supplies and Services	$1,200	$1,200
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
17	**TOTAL**	**$3,300**	**$3,300**
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

Program: 01 - Ethics, campaign finance and lobbying regulation

Decision Item (DIN): 4002 - Commissioner Per Diems and Other Meeting Costs

Numeric	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
01 - General program ops; GPR	$3,300	$3,300	0.00	0.00
Program Sub Total	**$3,300**	**$3,300**	**0.00**	**0.00**
DIN 4002 - Commissioner Per Diems and Other Meeting Costs Total	**$3,300**	**$3,300**	**0.00**	**0.00**
Agency Total	**$3,300**	**$3,300**	**0.00**	**0.00**

Decision Item by Fund Source

Decision Item (DIN): 4002 - Commissioner Per Diems and Other Meeting Costs

Source of Funds	Type	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
GPR	S	$3,300	$3,300	0.00	0.00
DIN 4002 - Commissioner Per Diems and Other Meeting Costs Total		**$3,300**	**$3,300**	**0.00**	**0.00**
Agency Total		**$3,300**	**$3,300**	**0.00**	**0.00**

Decision Item (DIN): 4003 - Lobbying Program Revenue

NARRATIVE

See attached document.

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. Also, the fees for principal registration increased effective July 1, 2021. It seems unlikely that another change would be supported so soon after that change. Previously, 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.

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

Decision Item (DIN): 4003 - Lobbying Program Revenue

Line Number	Expenditure Items	1st Year Cost	2nd Year Cost
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
17	**TOTAL**	**$0**	**$0**
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

Program: 01 - Ethics, campaign finance and lobbying regulation

Decision Item (DIN): 4003 - Lobbying Program Revenue

Numeric	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
01 - General program ops; GPR	$529,400	$529,400	3.30	3.30
23 - Lobbying admin; PR	($529,400)	($529,400)	(3.30)	(3.30)
Program Sub Total	**$0**	**$0**	**0.00**	**0.00**
DIN 4003 - Lobbying Program Revenue Total	**$0**	**$0**	**0.00**	**0.00**
Agency Total	**$0**	**$0**	**0.00**	**0.00**

Decision Item by Fund Source

Decision Item (DIN): 4003 - Lobbying Program Revenue

Source of Funds	Type	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
GPR	S	$529,400	$529,400	3.30	3.30
PR	S	($529,400)	($529,400)	(3.30)	(3.30)
DIN 4003 - Lobbying Program Revenue Total		**$0**	**$0**	**0.00**	**0.00**
Agency Total		**$0**	**$0**	**0.00**	**0.00**

Decision Item (DIN): 4004 - Continuing Support for Sunshine (Campaign Finance Information System) & IT/Office Supply Needs for Existing Staff

NARRATIVE

See attached document.

DIN 4004: Continuing Support for Sunshine (Campaign Finance Information System) & IT/Office Supply Needs for Existing Staff

In August 2025, the Commission successfully launched the new campaign finance registration and reporting website called "Sunshine." Since its launch, there have been approximately 3,900 reports filed and hundreds of new registrants created. The Commission has received a lot of praise for the new website, including in recent press coverage.

It is important to note that the budget for this enormous undertaking was $285,000 to build the new system and $135,000 per year for two years of support. The Commission paid exactly $285,000 for the build. There has been no additional cost for support, maintenance, new features that the Commission needs, and bug fixes. The only additional cost incurred by the Commission was $20,000 for deduplicating entities. This project was necessary because users in the legacy system created a lot of duplicate business entities, contributors, and vendors in error. As a result of the deduplication, the database went from having almost 12,000,000 entities to having only 2,666,634 entities. That is a 77% reduction in duplicate entities. It is important to note that the additional cost was absorbed by the Commission.

Since launch, the Commission has continued to work with the vendor on additional tools and features for the public, the filers, and for the Commission's staff. The vendor has provided exceptional service. The tools it has created for the Commission have been beyond what the Commission's staff expected. When bug fixes were necessary, they were done very quickly. The Commission is extremely satisfied with the quality of service the vendor has provided and would like to continue its relationship with the vendor.

There is additional work that needs to be completed over the next two years. Additionally, the Commission's current two IT contractors are working on updating the code for the SEI reporting website and will begin working to update the code for the lobbying reporting website. Given the additional work to be completed on Sunshine, and the workload facing the Commission's two IT contractors, the Commission is not in a position to assume full responsibility for Sunshine. Moreover, the Division of Enterprise Technology has recommended that the Commission continue its relationship with the vendor. Therefore, the Commission is seeking funding to continue its relationship with the vendor.

The vendor quoted a price of $142,000 per year for the next two years. This cost includes hosting, maintenance, new tools requested by the Commission (within the scope of the contract), free access to tools provided to other customers, bug fixes, and other support. Given the exceptional service, tools, and support, this minor increase (approximately 5%) is more than reasonable.

Additional IT/Office Supplies Needs for Existing Staff

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. This IT Contractor will also need supplies and services.

Additionally, the Commission will need to replace current staff's laptops, will need to purchase a new shredder, and renew software licensing during the upcoming biennium.

Decision Item by Line

Decision Item (DIN): 4004 - Continuing Support for Sunshine (Campaign Finance Information System) & IT/Office Supply Needs for Existing Staff

Line Number	Expenditure Items	1st Year Cost	2nd Year Cost
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	$177,100	$177,100
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	$166,300	$142,000
12	Debt service	$0	$0
13		$0	$0
14		$0	$0
15		$0	$0
16		$0	$0
17	**TOTAL**	**$343,400**	**$319,100**
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

Program: 01 - Ethics, campaign finance and lobbying regulation

Decision Item (DIN): 4004 - Continuing Support for Sunshine (Campaign Finance Information System) & IT/Office Supply Needs for Existing Staff

Numeric	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
01 - General program ops; GPR	$343,400	$319,100	0.00	0.00
Program Sub Total	**$343,400**	**$319,100**	**0.00**	**0.00**
DIN 4004 - Continuing Support for Sunshine (Campaign Finance Information System) & IT/Office Supply Needs for Existing Staff Total	**$343,400**	**$319,100**	**0.00**	**0.00**
Agency Total	**$343,400**	**$319,100**	**0.00**	**0.00**

Decision Item by Fund Source

Decision Item (DIN): 4004 - Continuing Support for Sunshine (Campaign Finance Information System) & IT/Office Supply Needs for Existing Staff

Source of Funds	Type	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
GPR	S	$343,400	$319,100	0.00	0.00
DIN 4004 - Continuing Support for Sunshine (Campaign Finance Information System) & IT/Office Supply Needs for Existing Staff Total		**$343,400**	**$319,100**	**0.00**	**0.00**
Agency Total		**$343,400**	**$319,100**	**0.00**	**0.00**

Decision Item (DIN): 4005 - Additional Attorney and Financial Specialist

NARRATIVE

See attached document.

DIN 4005: Additional Attorney and Financial Specialist

NOTE: If this DIN is adopted but DIN 4006 is not adopted, the Commission will still be required to move or expand its office space and this DIN will need to be adjusted accordingly.

Regardless of whether the Commission is going to implement 2023 Wisconsin Act 126, the Commission is in dire need of two additional positions. At the time the Wisconsin Ethics Commission was created, the transition plan provided a very small staff and envisioned there being some services shared with the Wisconsin Elections Commission. The transition plan envisioned that budget, finance, and office management services would be shared. The Wisconsin Ethics Commission was only provided one Office Management Specialist and was expected to have assistance from the Wisconsin Elections Commission budget and office staff. Additionally, the transition plan provided the Wisconsin Ethics Commission only one attorney. At the time of the transition, the two Commissions shared space in a private office building. However, the Commissions decided to separate and operate independently of each other. The Wisconsin Ethics Commission relocated to the Department of Administration Building.

Additional Attorney

As noted above, the Commission was provided one attorney in the transition plan. Unfortunately, the transition plan did not accurately forecast the amount of legal work the Wisconsin Ethics Commission would have. There were two primary areas where the plan failed to accurately account for the needed legal work. First, the plan failed to anticipate the number of complaints that the Ethics Commission would receive. Second, the plan failed to anticipate the number of civil forfeiture actions that the Commission would need to file to enforce the laws within the Commission's jurisdiction.

As to the complaint volume, the Commission attorney is responsible for reviewing each complaint, assisting in determining whether the complaint is legally sufficient to proceed, notifying the respondent, receiving the response from the respondent, preparing a memorandum for the Commission's consideration of the legal issues, presenting the complaint and response (if received) to the Commission, investigating the complaint (if ordered), providing reports as required by law, preparing orders for the Commission's consideration, resolving settlements the Commission has offered to violators, and, if necessary, filing a civil forfeiture action. Each of these steps takes a significant amount of time and preparation. Some complaints are more complicated and involved than others. The Commission receives hundreds of complaints per year. Including complaint emails that are not submitted in a proper form, the Commission estimates that in any given year it will receive nearly 300 complaints. Each of these requires time and communication. Even if it is just someone emailing allegations, the staff attorney must communicate with the person to explain the proper procedure for filing a complaint or directing them to the appropriate path to resolve their concerns.

Of those that were submitted in a proper form, the Commission averages about 150 complaints per year. During election years, that number is significantly higher. In 2022, the Commission had approximately 180 complaints that were submitted in a proper form. In 2024, that number rose to about 210 complaints submitted in a proper form. Each of these complaints requires multiple hours of work reviewing and processing complaints. For these complaints, one would expect a minimum of 10 hours of work. As such, just the validly submitted complaints generate anywhere between 1100 hours and 2100 hours of legal work per year.

Additionally, the Commission has had to litigate a number of matters. Since 2022, the Commission has been involved in 134 cases. Most of these cases have been civil forfeiture actions initiated by the Commission. Typically, these lawsuits require anywhere between 20-50 hours per case before resolution. The Commission expects to have to litigate 20-25 lawsuits per year. It is reasonable to estimate that these cases would use approximately 1000 hours per year. Approximately 5 of the cases were lawsuits filed against the Commission. This type of litigation is especially labor-intensive. In the 5 or so cases where the Commission was sued, the Commission's staff have spent hundreds of hours on those cases alone.

Employees of the State are expected to work 2080 hours per year. In most years, the complaint-related work is enough to consume one attorney's full 2080 hours. Litigation would easily add 1000-2000 hours per year. These two facets of the job alone justify hiring an additional attorney. However, the Commission's attorney is also responsible for providing advice to requestors, reviewing public records requests and responses, assisting program staff with legal questions, advising the Administrator concerning contracts and other legal issues and more. As a result of the inadequate legal staffing, the Commission currently has a backlog of complaints. In order to provide the appropriate level of services, and do so in a timely manner, the Commission needs an additional attorney regardless of whether 2023 Wisconsin Act 126 is implemented.

Financial Specialist

Since the creation of the Wisconsin Ethics Commission, the Wisconsin Ethics Commission has relied on its one Office Management Specialist to handle all of the operational needs from purchasing, invoice payments, receipt of statutory fees and other monies, budget planning and administration, facilities management, records management, meeting work and more. The Commission has also had to rely on separation of duties exceptions in the financial systems because the Office Management Specialist position is the only position that has the knowledge, skills and experience to handle financial transactions in the state's systems. Over time, additional responsibilities have been added such as becoming the agency's continuity planning coordinator, tenant coordinator, and working with other agencies. As noted, the plan contemplated much of this work being shared by the two Commissions. However, that has not been the case. The workload requires an additional position to carry out all of the duties and responsibilities. Therefore, the Commission is asking for a Financial Specialist position to be added to the Commission's staff. This position would be responsible for journals, vouchers, deposits, PCI compliance, ePayments/Credit Card Reconciliation, year-end certifications, U.S. Bank reconciliation, expense reports, attestations, the SCO Checklist. The position would also assist and serve as a back-up for the Office Management Specialist and would assist with purchasing and procurement, records management, budget management, and more.

Decision Item by Line

Decision Item (DIN): 4005 - Additional Attorney and Financial Specialist

Line Number	Expenditure Items	1st Year Cost	2nd Year Cost
01	Permanent Position Salaries	$133,500	$160,200
02	Turnover	$0	$0
03	Project Position Salaries	$0	$0
04	LTE/Misc. Salaries	$0	$0
05	Fringe Benefits	$49,700	$59,700
06	Supplies and Services	$16,900	$20,300
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	$5,400	$0
12	Debt service	$0	$0
13		$0	$0
14		$0	$0
15		$0	$0
16		$0	$0
17	**TOTAL**	**$205,500**	**$240,200**
18	Project Positions Authorized	0.00	0.00
19	Classified Positions Authorized	2.00	2.00
20	Unclassified Positions Authorized	0.00	0.00

Decision Item by Numeric

Program: 01 - Ethics, campaign finance and lobbying regulation

Decision Item (DIN): 4005 - Additional Attorney and Financial Specialist

Numeric	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
01 - General program ops; GPR	$205,500	$240,200	2.00	2.00
Program Sub Total	**$205,500**	**$240,200**	**2.00**	**2.00**
DIN 4005 - Additional Attorney and Financial Specialist Total	**$205,500**	**$240,200**	**2.00**	**2.00**
Agency Total	**$205,500**	**$240,200**	**2.00**	**2.00**

Decision Item by Fund Source

Decision Item (DIN): 4005 - Additional Attorney and Financial Specialist

Source of Funds	Type	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
GPR	S	$205,500	$240,200	2.00	2.00
DIN 4005 - Additional Attorney and Financial Specialist Total		**$205,500**	**$240,200**	**2.00**	**2.00**
Agency Total		**$205,500**	**$240,200**	**2.00**	**2.00**

Decision Item (DIN): 4006 - Implementation of 2023 Wisconsin Act 126

NARRATIVE

See attached document.

DIN 4006: Implementation of 2023 Wisconsin Act 126

NOTE: The calculations for this DIN are based on the current effective date of December 1, 2027. If the effective date of 2023 Wisconsin Act 126 is changed as requested in DIN 4007, the numbers for this DIN will need to be recalculated.

The Legislature passed 2023 Wisconsin Act 126 and 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 December 1, 2027.

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, the success of this implementation 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. 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 twice surveyed the local filing officers to try to ascertain the additional workload the Commission will be responsible for as a result of the Act. These surveys 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 first 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. The results from the second survey were not significantly different than the first survey results.

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 recognizes that there may be concerns about hiring that many additional Ethics Specialists on a permanent basis. Therefore, the Commission requests 8 permanent Entry Ethics Specialists and 5 project Entry Ethics Specialists. This will allow the Commission to reevaluate the staffing levels at the end of the biennium. The Commission hires Entry Ethics Specialists at a rate of $30.20, plus fringe costs. The Commission's fringe rate for the upcoming biennium is 37.27%.

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 $40/hr., plus fringe costs. The Commission intends to hire the project position as a non-senior position with the anticipated 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. While there is an attorney position requested in a separate decision item, that request is separate from the additional attorneys needed as a result of 2023 Wisconsin Act 126.

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, a 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 2 new attorney positions created and funded in addition to the one requested in the other decision item. In addition to that position, the Commission also requests the creation of 2 additional permanent attorney positions to implement the Act. These 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 positions at $53/hr., plus fringe costs.

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. For the previous biennial budget request, DOA staff provided estimates for these costs and the new rent rate. The following are those costs:

- $124,950 for construction in the new space (One-time cost);
- $160,644 for costs relating to moving existing furniture and getting new furniture for the new positions (One-time cost); and
- $117,958.08 rent per year.

It is important to note that the budget request already includes the current rent. Therefore, if the DIN is approved, the rent increase will be offset by that amount. The Commission is currently paying $49,332.48 for rent annually. So, the budget for rent should be increased by $68,625.60.

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.

4. Legal Needs

The Commission seeks a delay in the effective date of the Act to allow proper time to hire needed staff. The Commission also requests repeal of WIS. STAT. § 11.1304(6)(b). For an explanation, please see the narrative for DIN 4007.

Decision Item by Line

Decision Item (DIN): 4006 - Implementation of 2023 Wisconsin Act 126

Line Number	Expenditure Items	1st Year Cost	2nd Year Cost
01	Permanent Position Salaries	$671,800	$806,200
02	Turnover	$0	$0
03	Project Position Salaries	$322,400	$386,900
04	LTE/Misc. Salaries	$0	$0
05	Fringe Benefits	$370,600	$444,700
06	Supplies and Services	$371,200	$371,200
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	$337,200	$0
12	Debt service	$0	$0
13		$0	$0
14		$0	$0
15		$0	$0
16		$0	$0
17	**TOTAL**	**$2,073,200**	**$2,009,000**
18	Project Positions Authorized	6.00	6.00
19	Classified Positions Authorized	11.00	11.00
20	Unclassified Positions Authorized	0.00	0.00

Decision Item by Numeric

Program: 01 - Ethics, campaign finance and lobbying regulation

Decision Item (DIN): 4006 - Implementation of 2023 Wisconsin Act 126

Numeric	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
01 - General program ops; GPR	$2,073,200	$2,009,000	17.00	17.00
Program Sub Total	**$2,073,200**	**$2,009,000**	**17.00**	**17.00**
DIN 4006 - Implementation of 2023 Wisconsin Act 126 Total	**$2,073,200**	**$2,009,000**	**17.00**	**17.00**
Agency Total	**$2,073,200**	**$2,009,000**	**17.00**	**17.00**

Decision Item by Fund Source

Decision Item (DIN): 4006 - Implementation of 2023 Wisconsin Act 126

Source of Funds	Type	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
GPR	S	$2,073,200	$2,009,000	17.00	17.00
DIN 4006 - Implementation of 2023 Wisconsin Act 126 Total		**$2,073,200**	**$2,009,000**	**17.00**	**17.00**
Agency Total		**$2,073,200**	**$2,009,000**	**17.00**	**17.00**

Decision Item (DIN): 4007 - Legal Changes Required to Implement 2023 Wisconsin Act 126 (No Fiscal Impact)

NARRATIVE

See attached document.

DIN 4007: Legal Changes Required to Implement 2023 Wisconsin Act 126 (No Fiscal Impact)

If required to implement 2023 Wisconsin Act 126, the Commission is the following legal changes.

Delayed Effective Date

The effective date of 2023 Wisconsin Act 126 was originally July 1, 2025. The effective date was delayed until December 1, 2027. This date presents significant challenges for the Commission. First, the budget is not typically signed into law until early July. The practical reality is that the current effective date of December 1, 2027, is going to be nearly impossible to meet. The Commission is contemplating adding a total of approximately 20 people. The hiring process when the Commission recently hired two new ethics specialists took approximately 2 months to complete. That process went smoothly and quickly. Other recruitments have taken considerably longer.

The Commission would not be able to even post the positions until the budget is passed. Assuming the best-case scenario, the posting would probably not be done until the end of July. Once posted, the position is usually open for applications for at least two weeks. The recruitment process will require time from six of the Commission's eight employees. Half of the staff will rate applicants. This process can take two weeks or more. The other half would conduct the interviews. The interviews would likely also take two to three weeks. If the Commission was fortunate, we would extend offers in September. This would put new employee start dates into October or November in the best-case scenario. Once the staff are onboard, there are two weeks or more of onboarding.

Local candidates typically file their papers to run for office beginning in November. The bulk of them file their papers in December. It is not reasonable to expect that the new staff will be onboard or fully prepared to implement the Act on December 1, 2027. New staff typically need a couple of months before they can help without frequent assistance from other members of the team. Therefore, staff is recommending that the Commission ask the effective date of the Act to be delayed until after the 2028 Spring Election. This will allow staff the time to get up to speed and get things properly set up in Sunshine. The Commission requests the new effective date be May 31, 2028.

Require all Registrants and Reports to be Filed Electronically

WIS. STAT. § 11.1304(6)(b) requires the Commission to allow committees accepting $1,000 or less in contributions during the campaign period to file their reports on paper. This provision has been in Chapter 11 since its rewrite in 2016, if not before. Since 2016, internet access has improved significantly statewide. Since 2018, there has only been one person that would not use the online registration and reporting website. If the Act is allowed to take effect, there are thousands, if not tens of thousands of candidates that would be within the threshold to file on paper. If these individuals insist on doing so, this will dramatically increase the amount of work placed on the staff. Upon receiving a paper in the mail, staff would have to manually enter the information into Sunshine so that the public can see what is being raised and spent. Then, there would be the work required to scan and save the reports and dispose of the paper version. If this provision is not repealed, the Commission anticipates needing several additional staff members to receive and process paper filings. Given the increased availability of internet services, and to avoid increased workload requiring additional staff, the Commission requests that WIS. STAT. § 11.1304(6)(b) be repealed and that all registrants register and report online.

Decision Item by Line

Decision Item (DIN): 4007 - Legal Changes Required to Implement 2023 Wisconsin Act 126 (No Fiscal Impact)

Line Number	Expenditure Items	1st Year Cost	2nd Year Cost
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
17	**TOTAL**	**$0**	**$0**
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 (DIN): 7900 - Technology Improvements to Enhance Cybersecurity

NARRATIVE

See attached document.

DIN 7900: Technology Improvements to Enhance Cybersecurity

In consultation with the Department of Administration's Division of Enterprise Technology, the funds in this DIN will be used to purchase software to improve the Wisconsin Ethics Commission's Cybersecurity posture. Additionally, in consultation with the Division of Enterprise Technology, the Commission plans to move from an Agency Managed Server to a Containerized Hosting System. This change will significantly improve the Commission's cybersecurity posture. The following are the anticipated costs associated with this Decision Item:

- Web Application firewall, Content Delivery Network and Edge Security is $10,800 annually (3 Sites at $300 per site per month or system with a domain name. (E.g., campaignfinance.wi.gov) The services are centrally managed by DET.)
- Tenable & Attack Surface Management is $1,776 annually (4 assets and sites at $37 per asset per month)
- Cyber cost per developer for GitHub Advanced Security and supporting AI tools: $9,000 annually (2 Developers at $4,500 annually per developer for developer licenses and subscriptions).
- Telemetry & Log Ingestion: $5500 annually (Centralized log ingestions and agency archival log storage).
- One-Time DevSecOps & Migration Contractor Support: $135,000 (One-time funding for contractors to set up automated pipelines and containerize the SEI and Lobbying sites).
- Ongoing Container Costs $6,509.28 Annually (storage/memory, etc.)

Decision Item by Line

Decision Item (DIN): 7900 - Technology Improvements to Enhance Cybersecurity

Line Number	Expenditure Items	1st Year Cost	2nd Year Cost
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	$33,600	$33,600
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	$135,000	$0
12	Debt service	$0	$0
13		$0	$0
14		$0	$0
15		$0	$0
16		$0	$0
17	**TOTAL**	**$168,600**	**$33,600**
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

Program: 01 - Ethics, campaign finance and lobbying regulation

Decision Item (DIN): 7900 - Technology Improvements to Enhance Cybersecurity

Numeric	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
01 - General program ops; GPR	$168,600	$33,600	0.00	0.00
Program Sub Total	**$168,600**	**$33,600**	**0.00**	**0.00**
DIN 7900 - Technology Improvements to Enhance Cybersecurity Total	**$168,600**	**$33,600**	**0.00**	**0.00**
Agency Total	**$168,600**	**$33,600**	**0.00**	**0.00**

Decision Item by Fund Source

Decision Item (DIN): 7900 - Technology Improvements to Enhance Cybersecurity

Source of Funds	Type	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
GPR	S	$168,600	$33,600	0.00	0.00
DIN 7900 - Technology Improvements to Enhance Cybersecurity Total		**$168,600**	**$33,600**	**0.00**	**0.00**
Agency Total		**$168,600**	**$33,600**	**0.00**	**0.00**

Decision Item (DIN): 7910 - Central Services Adjustments

NARRATIVE

See attached document.

DIN 7910: Central Services Credit

This increase is based on the growth in DOA Central Services costs, which have increased in large part due to inflation and general wage adjustments that have accumulated over time. Agencies have no control over these assessment costs. The Wisconsin Ethics Commission has had to manage the increased costs, which has meant deferring on IT contractor software needs, delaying replacement of office equipment that has reached the end of its lifecycle, and other needs. With this budget increase, Wisconsin Ethics Commission will be able to update outdated office equipment, purchase additional software and/or hardware, and provide other tools for staff success.

Decision Item by Line

Decision Item (DIN): 7910 - Central Services Adjustments

Line Number	Expenditure Items	1st Year Cost	2nd Year Cost
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	$6,800	$6,800
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	$0	$0
12	Debt service	$0	$0
13		$0	$0
14		$0	$0
15		$0	$0
16		$0	$0
17	**TOTAL**	**$6,800**	**$6,800**
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

Program: 01 - Ethics, campaign finance and lobbying regulation

Decision Item (DIN): 7910 - Central Services Adjustments

Numeric	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
01 - General program ops; GPR	$6,800	$6,800	0.00	0.00
Program Sub Total	**$6,800**	**$6,800**	**0.00**	**0.00**
DIN 7910 - Central Services Adjustments Total	**$6,800**	**$6,800**	**0.00**	**0.00**
Agency Total	**$6,800**	**$6,800**	**0.00**	**0.00**

Decision Item by Fund Source

Decision Item (DIN): 7910 - Central Services Adjustments

Source of Funds	Type	1st Year Total	2nd Year Total	1st Year FTE	2nd Year FTE
GPR	S	$6,800	$6,800	0.00	0.00
DIN 7910 - Central Services Adjustments Total		**$6,800**	**$6,800**	**0.00**	**0.00**
Agency Total		**$6,800**	**$6,800**	**0.00**	**0.00**

ACT 201

Proposal under s. 16.42(4)(b): **0% change in each fiscal year**
FY: **FY28 and FY29**
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 "FY28" TO "FY28 AND 29".

						(See Note 1)						(See Note 2)		Change from Adj Base	
	Appropriation		Fund			0% Change	**Proposed Budget 2027-28**		Item	Change from Adj Base		Remove SBAs		after Removal of SBAs	
Agency	Alpha	Numeric	Source	$	FTE	Target	Proposed $	Proposed FTE	Ref	$	FTE	$	FTE	$	FTE
521	**1a**	101	GPR	$834,500.00	4.70	$0	$818,400	4.70		($16,100)	0.00	$16,100	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	$528,200.00	3.30	$0	$510,700	3.30		($17,500)	0.00	$17,500	0.00	$0	0.00
Totals				**$1,623,900.00**	**8.00**	**$0**	**$1,590,300**	**8.00**		**($33,600)**	**0.00**	**$33,600**	**0.00**	**$0**	**0.00**

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

1
2
3

ACT 201

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

FY: **FY28 and FY29**

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 "FY28" TO "FY28 AND 29".

Agency	Appropriation Alpha	Appropriation Numeric	Fund Source	$	FTE	(See Note 1) 5% Change Target	Proposed Budget 2027-28 Proposed $	Proposed Budget 2027-28 Proposed FTE	Item Ref	Change from Adj Base $	Change from Adj Base FTE	(See Note 2) Remove SBAs $	(See Note 2) Remove SBAs FTE	Change from Adj Base after Removal of SBAs $	Change from Adj Base after Removal of SBAs FTE
521	**1a**	101	GPR	$834,500.00	4.70	($41,700)	$770,545	4.70		($63,955)	0.00	$16,100	0.00	($47,855)	0.00
521	**1be**	105	GPR	$225,000.00	0.00	($11,300)	$194,155	0.00		($30,845)	0.00	$0	0.00	($30,845)	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)	$4,500	0.00		$0	0.00	$0	0.00	$0	0.00
521	**1im**	123	PR	$528,200.00	3.30	($26,400)	$508,200	3.30		($20,000)	0.00	$17,500	0.00	($2,500)	0.00
Totals				**$1,623,900.00**	**8.00**	**($81,200)**	**$1,509,100**	**8.00**		**($114,800)**	**0.00**	**$33,600**	**0.00**	**($81,200)**	**0.00**

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 = ($81,200)

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

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

1 Reduces Supplies & Services by $30,845; this reduction may inhibit the ability for the Commission Staff and/or outside Counsel to conduct investigations as authorized by the Commissioners.

2 Reduces Supplies & Services by $2,500; 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.

3 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 probably will 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.