



Wisconsin Ethics Commission

Campaign Finance | Lobbying | Ethics
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MEMORANDUM

To: CFIS Users & General Public
From: Daniel A. Carlton, Jr., Administrator
Date: December 7, 2023

Re: New Campaign Finance Website

Dear CFIS Users and Other Interested Persons,

We are writing to let you know that the Commission is in the process of building a new Campaign Finance Information System (“CFIS”). The new website will be launched this month. We want to be as transparent as possible about this process. With that in mind, we would like to let you know some background information about what has happened, the challenges that lie ahead, and what to expect going forward.

First, some background information will be helpful. As you know, the Commission is responsible for administering the campaign finance laws, lobbying laws, and ethics laws. Each program area has its own registration type of requirements and its own reporting requirements. Some officials are required to file an annual disclosure of their financial interests called a Statement of Economic Interests (“SEI”). Under the lobbying law, lobbyists must get licensed, principals must register and authorize lobbyists to act on their behalf, and lobbyists and principals both report their activity. Finally, under campaign finance law, candidates and the groups that support or oppose them are required to register and report. We are required to make most of this information available to the public online. The greatest benefit of doing these activities online is the transparency.

Many states build their own solutions and maintain them in-house. There are a few reasons for this. First, there are very few off the shelf applications for filing these reports. Next, the products that are for sale can be very costly. One vendor quoted a price of more than \$500,000. (That’s about half of the Commission’s budget for one year!) Also, the vendors frequently require an ongoing maintenance contract. Maintenance contracts range from \$50,000-\$150,000 per year. Finally, the vendors tend to charge a lot for fixes and new features. These can cost between \$100-\$200 per hour.

The Commission currently has one IT contractor. She builds, maintains, and fixes the applications we own and can help resolve issues with the one we do not own (CFIS). She has been working with our websites for approximately 10 years. The contractor built the SE website and the original lobbying website. She also was part of the partnership with the University of Wisconsin’s DoIT Program to build the new lobbying website. She now maintains it. Over the years, the Commission has seen how beneficial it is to own its own applications. We have been able to quickly fix issues, create new features to improve the system, and maintain the applications without significant additional cost. When considering upgrading CFIS, it was clear that it was in the best interests of the Commission and the public to have a resource that we would own and maintain. We wanted to do it in-house.

Since its inception, the Commission has had two major IT goals: to replace the lobbying registration and reporting website and CFIS with modern, more user-friendly systems. We tackled the lobbying website

first. There were a couple of reasons for this. First, CFIS was being supported by the vendor. We expected that this support would continue for at least a year or two. Second, it was an exponentially smaller task than replacing CFIS. Third, we built the previous lobbying website in-house and it was being maintained by our staff. We knew the lobbying website needed replacing, and CFIS was being supported, so prioritizing the lobbying website made sense. Also, by tackling the lobbying website first, it would allow us to evaluate the challenges we would face if we built the new version of CFIS in-house. Overall, we are proud of the new lobbying website. The feedback we have received is very positive.

While we were building and launching the new lobbying website, we were considering how we were going to tackle the new CFIS project. We evaluated several options to get our new campaign finance website: building from scratch internally, building internally based on code from another state, and working with a vendor. Because of the lessons we've learned over our history, the Commission decided that it wanted to build the new system in-house. It would be less expensive to build. We would own a full copy of the code. We could maintain and fix issues much quicker and at less cost than a vendor likely could. We estimated that the planned project would take approximately two years. As a part of its biennial budget request submitted in September 2022, the Commission requested funding for two additional IT contractors to build the new campaign finance website. Things unfortunately did not work out as planned. Before explaining what happened, it is important for you to know that Commission staff began asking the current vendor about the transition from the current version of CFIS to a new product in June 2022. There were several attempts to discuss the so called "end of life" planning for the current product between then and January 2023. The current vendor did not provide any substantive response.

In January 2023, Commission staff began observing issues with the current version of CFIS. As a result of these issues, the website was not working at times. The issue has occurred a few times since. Staff can now easily resolve the issue and restore operations to normal quickly. We also asked the vendor to fix the issue. However, the vendor declined. Instead, the vendor wanted the Commission to buy their new campaign finance product. Then, in April 2023, the vendor unexpectedly advised that they would not support CFIS after December 31, 2023. Obviously, this surprise meant that plans had to change quickly. We did not have the resources to build a website of this complexity in less than 8 months. So, we knew that we would need the help of a vendor. Based on feedback we got from other states, we again confirmed that we still wanted to own and maintain the end product after it was built. We started looking around for potential vendors to help us. There are only a couple of vendors with any experience with campaign finance websites. We identified only one that would allow us to own our website after we were done. The references we contacted about that vendor gave the vendor very positive reviews.

Luckily, the Joint Finance Committee had not yet considered the Commission's budget request. Within two weeks of the news, we prepared a proposed course and provided pertinent budgetary information to the Joint Finance Committee. Thanks to the support of the legislative leadership, the Chairs and members of the Joint Finance Committee, and the Governor, we received additional funding to quickly pivot from the in-house plan to working with the vendor to create a new version of CFIS.

Once the budget was signed, Staff worked with DOA procurement staff to make sure the contract with the new vendor is in the best interests of the state. We began initial planning and preparation with the Division of Enterprise Technology. Towards the end of August, we were ready to start working on the new website. After all the work to get to the building phase of the project, we were left with less than 4 months to build the new system from scratch.

Obviously, this is a very short period in which to build a very complex system. As you know from your filing experience, there is a lot of required information. Each type of registrant has different needs and use cases. There are also conditional use cases, where the transaction being reported is only required under certain circumstances. The website must also have some administrative functions so that we can assist users when they need help. This project is a huge undertaking.

Our goal has been to have the new campaign finance website up before the support from the current vendor ends. However, considering the complexity and the extremely short period of time, we knew that some strategic decisions would have to be made. We had to be both creative and strategic to even attempt to meet that timeline. Because of how things occurred, we have to use a minimum viable product (“MVP”) approach to attempt to meet that deadline.

In this case, the MVP must allow users to register a committee or conduit, file all required reports, and provide a user-friendly public display of information. It will also have some of the administrative tools we need to assist you. The primary drawback to this approach is that it requires us to release a product that is not the final product. There will be changes and additional features added. We expect changes over the course of the next 6 months to a year. This is not the most desirable approach for us or the vendor. However, we have no other option to ensure a safe, stable, and supported website. As you know, 2024 is an election year. We cannot rely on an unsupported website during an election year. So, we ask for your understanding and patience.

So, what is to come? We expect the new website to be online sometime this month. While we would love to provide a date certain, right now we cannot. We are working with the vendor to make sure the functionality we need is there. We are doing internal testing now. We also have a few outside folks who have kindly offered to be testers for us. Once we are confident that the MVP product works well, we will proceed to launch.

What does launch look like? Before having the new website live, we will communicate with all of the users. We will provide training opportunities prior to the January Continuing Report being due. We will record these and post them on our website. We will provide more information as things develop.

What can you do now? First, know that you do not have to worry about information you may have saved in the current version of CFIS. We will be migrating that over for you. It should be seamless. Your registration and reported data will be there when you create your user account. You don’t worry about lost data. We are maintaining backup copies of all information you’ve submitted. Second, we ask for patience and understanding. As you can see, this is not an ideal situation for any of us. Finally, we want your feedback. Our goal with our applications is to make things as clear and easy to use as possible and to provide the public the greatest amount of transparency possible. We will gladly receive any feedback you have. We promise to evaluate it and incorporate it where it is prudent to do so. Just know that this part may take some time.

Hopefully, the foregoing has shown you that, due to circumstances beyond our control, we were put in a very challenging position. We expect to have a great product for you even during the early MVP stage. We are excited by what we have seen so far and think you will like the new product. But, we also want to be transparent that there may be some bumps in the road. Stay tuned for more information.

Should you have any questions or concerns, please do not hesitate to contact us via email at CampaignFinance@wisconsin.gov or via phone at (608) 266-8123.

Sincerely,

A handwritten signature in dark ink, appearing to read "D. A. Carlton, Jr.", with a stylized, cursive script.

Daniel A. Carlton, Jr.
Administrator
Wisconsin Ethics Commission