

Agency Programs/Activities: Inventory and Key Data  
NEW YORK STATE COMMISSION ON PUBLIC INTEGRITY

Relation to Core Mission (H/M/L)	Program/Activity	Spending Category (SO, ATL, CAP)	3/31/09 FTEs (All Funds)	General Fund Disbursements (\$000s)			State Special Revenue Funds Disbursements (\$000s)			Capital Projects Funds Disbursements (\$000s)								
				2006-07 Actual	2007-08 Actual	*2008-09 Plan	*2009-10 Projected	2006-07 Actual	2007-08 Actual	2008-09 Plan	2009-10 Projected	2006-07 Actual	2007-08 Actual	2008-09 Plan	2009-10 Projected			
	CPI All Programs					\$ 952,993	\$ 882,168											
HIGH	EXECUTIVE	SO	3			\$ 288,525	\$ 241,879											
HIGH	PUBLIC INFORMATION UNIT	SO	2			\$ 148,414	\$ 150,444											
HIGH	General Records Access	SO																
HIGH	ADMINISTRATIVE UNIT	SO	6			\$ 374,889	\$ 384,405											
HIGH	Administrative Support Services Program	SO																
LOW	Internal Control Program	SO																
HIGH	INFORMATION TECHNOLOGY	SO	8			\$ 553,002	\$ 705,743											
HIGH	Commission Website Development and Management	SO																
HIGH	On-line Registration Application Development and Maintenance	SO																
HIGH	Data Entry/Scanning	SO																
HIGH	Financial Disclosure (FDS) Programming and Maintenance	SO																
HIGH	Network Administration and IT Support Help Desk	SO																
LOW	Cyber Security Policy Implementation, Monitoring and Reporting	SO																
LOW	Webcasting; Executive Order #3	SO																
HIGH	LEGAL PROGRAMS	SO	13			\$ 1,267,853	\$ 1,178,872											
HIGH	NORC Hearings & Court Litigation	SO																
HIGH	Opinions and Email/Telephonic Guidance	SO																
HIGH	Legislative Proposals & Regulatory Actions	SO																
HIGH	FDS Exemptions & Requests to Delete Information from FDS Filings	SO																

\*Does not include 7% State Operations Reduction





NYS Commission on Public Integrity  
PROGRAM INFORMATION SHEET

**Program:** Executive

**Mandate:**

Public Employees Ethics Reform Act (PEERA) Chapter 14, Laws of 2007;

**Mandated Funding Level:** None

**Brief Description/History/Background:**

PEERA created the NYS Commission on Public Integrity from a merger of the NYTSC on Lobbying and NYS Ethics Commission in September 2007. This statute created a 13 member Commission that serve without compensation and is charged with exercising the powers and duties set forth in the statute. The Commission appoints the Executive Director who is authorized to act on such matters as delegated by the Commission. All Policies, Procedures, Rules, Guidelines and Commission decisions are made within this body and implemented through the Executive Director. The Executive is also staffed by a Hearing Examiner who conducts hearings and proceedings concerning alleged violations of the statute referred in PEERA and makes recommendations to the Commission.

**Issues:**

**Population Served:**

State Employees, Lobbyists, Clients and the Public

**Performance Measures:**

**Commission on Public Integrity  
PROGRAM INFORMATION SHEET**

**Program:** Public Information Unit: General

**Mandate:**

Executive Law Section 94(9)(g) requires the Commission to receive complaints and referrals alleging violations of the law.

Executive Law Section 94(9)(l) requires the Commission to prepare an annual report to the Governor and the Legislature.

Executive Law Section 94(15) requires the Commission to issue advisory opinions.

Executive Law Section 94(16)(b) requires the Commission to provide education to individuals subject to its jurisdiction.

**Mandated Funding Level:**

none

**Brief Description/History/Background:**

The Public Information Office is responsible for monitoring the Commission's office e-mail and referring complaints to the appropriate unit or to an outside agency if appropriate. Requests for advisory opinions are referred to the appropriate counsel.

The Office also prepares the annual report, as well as news releases.

Educational materials prepared by the office include fliers and brochures presenting the requirements of the law, as well as a newsletter for all State officers and employees. Beginning in 2008, this unit prepares quarterly online newsletters for the Commission's website.

The Office staffs a monthly information table at the Empire State Plaza and represents the Commission at conferences and meetings as necessary. The Office also presents training sessions in cooperation with the Training Unit.

**Issues:**

**Population Served:**

All State employees and the public.

**Performance Measures:**

Quality of media coverage and timeliness of response. The average response is within 48 hours. Approximately 40 emails are received on a daily basis.

**Commission on Public Integrity  
PROGRAM INFORMATION SHEET**

**Program Public Information Unit:** Records Access

**Mandate:**

Article 6 of the Public Officers Law (FOIL)

19 NYCRR, Part 937, Executive Law 94 (17)

Lobbying Act, Section l-s

**Mandated Funding Level:**

none

**Brief Description/History/Background:**

The Public Information Office is responsible for responding to all requests for public information. This includes requests from members of the media as well as members of the general public. Pursuant to the Lobbying Act, All information provided by lobbyists, clients and public corporations pursuant to this Act is required to be made available for inspection or copying available for public inspection and available online. Effective in May 2007, FDS filings were made available for copying by the Public and Failure to File Notices were required to be posted online.

**Issues:**

Most Commission records are exempt from FOIL, except for some limited exceptions noted above. The Public information office is responsible to respond to all FOIL and Public Information requests. This office is also responsible to redact certain information from FDS filings and Advisory opinions.

**Population Served:**

All State employees and the Public

**Performance Measures:**

Timeliness of Response. We have received 55 requests to view FDS filings in 2008.

In 2007 we received 41 requests to inspect 291 FDS filings. In addition, we received 41 FOIL requests to view Lobbying records although it is important to note all Lobbyist information is available online.

NYS Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Administrative Unit- Administrative Support Services Programs

**Mandate:**

Chapter 50, Laws of 2008 and Chapter 14, Laws of 2007 Administrative Services support provides all services and resources to enable CPI's Programs to carryout their mission.

**Mandated Funding Level:**

None

**Brief Description/History/Background:**

In September 2007, this unit originated from the experienced staff of Administrative Unit and Support Services Unit from the Lobby Commission. The Ethics Commission which had no internal Admin staff, received support services from the Dept of State which charged Ethics and subsequently, CPI, costly administrative chargebacks for their services. The FY 08-09 Executive Budget , returned all administrative and support service functions to CPI's six person Admin Unit. This change was completed at the end of June 2008.

**Issues:**

Since the process of returning Administrative functions was not completed until the end of June, full savings from this transfer will not be realized until FY 09-10. During this period from April 1, 2008 - June 30, 2008, DOS charged CPI's personal services appropriation \$118,800 for DOS administrative staff services. During FY 07-08, fiscal records from both Ethics and CPI show \$338,555 was charged to Ethics' and CPI's personal service appropriations for DOS Administrative staff services.

**Population Served:**

CPI staff

**Performance Measures:**

Efficiency and timeliness of Admin services to CPI's units. Budget planning and implementation meet all CPI's program needs and follow all procedures and requirements of DOB and OSC. CPI's annual revenues (\$279,000) for the first 4 months of FY 08-09 are processed quickly into the General Fund. Purchases and spending are completed in the most cost effective manner and meet all spending constraints. Accounting and reconciliation of accounts are accurate, timely and error free.

NYS Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Administrative Unit- Internal Control Program

**Mandate:** NYS Internal Control Act

**Mandated Funding Level:**

None

**Brief Description/History/Background:**

The Internal Control Act mandates that State Agencies establish a system of Internal Control and Review to safeguard all assets and resources and guard against loss, misuse and theft. NYTSC on Lobbying (NYTSCOL) had one staff person dedicated solely to this program while the Dept of State handled the internal control function on behalf of the Ethics Commission (EC). CPI has designated one staff member to serve, in addition to their other duties, as its Internal Control Officer and work in conjunction with the Dir Fin Prog Admin to implement a comprehensive Internal Control Program for the Commission.

**Issues:**

Since the merger of NYTSCOL and EC, extensive revisions are being made to the internal control program and internal controls are being developed for new programs and several existing program areas that had never had controls in place. Extensive staff training has been required in addition to developing new vulnerability and risk assessments and development of Internal control procedures and testing programs.

**Population Served:**

Staff of CPI and the State of New York

**Performance Measures:**

Staff undergo internal control training once a year. All functional units have been identified and have undergone an initial vulnerability and risk assessment. Internal Control procedures have been drafted and implemented for all functions. High risk activities have been identified and are reviewed annually. A schedule of review has been established for all functions.

**NYS COMMISSION ON PUBLIC INTEGRITY  
PROGRAM INFORMATION SHEET**

**Program:** Information Technology: Random Audit Program Data

**Mandate:**

The Lobbying Act requires the Commission to conduct a program of random audits.

**Mandated Funding Level:** NONE

**Brief Description/History/Background:**

The Commission's IT department provides an ASCII delimited data file, that is generated from the On-Line Registration Application and then e mailed to the outside consultant on a quarterly basis.

**Issues:**

The Lobbying Act requires that all audits be selected on an absolutely random basis and that such selection process be certified by an outside accountant as random.

**Population Served:**

Lobbysits, Clients and Public Corporations selected.

**Performance Measures:**

Certification of Outside Accountant

NYS COMMISSION ON PUBLIC INTEGRITY  
PROGRAM INFORMATION SHEET

**Program:** Information Technology: Commission Website Development and Management

**Mandate:** Public Employee Ethics Reform Act o (PEERA)

**Mandated Funding Level:** NONE

**Brief Description/History/Background:**

Per PEERA, the Commission is required to maintain a publicly accessible website. A new website was created that combined important information regarding Lobbying and Ethics. This new website is a collaboration of all of CPI's units and was launched by the due date. The website provides important information to the Commission's various users in a quick and efficient manner. Future enhancements will make it easier for the general public to receive important information as well as reduce the cost of printing and mailing CPI publications.

**Issues:**

**Population Served:** General Public

**Performance Measures:**

Since its creation in January 2008, the Commission's website has provided valuable information to the general public. Since this website is new there are no benchmarks available for comparison. The total number of external hits for the website for the first half of 2008 were 8,080,203.

NYS COMMISSION ON PUBLIC INTEGRITY  
PROGRAM INFORMATION SHEET

**Program:** Information Technology: On-Line Registration Application Development and

**Mandate:**

The Lobbying Act requires that reports be filed but not electronically. All information provided in filings must be made available online.

**Mandated Funding Level:** NONE

**Brief Description/History/Background:**

The Commission's online Lobbyist Registration Application was launched in 2003 to replace an electronic imaging system that was slow and unreliable.

The Commission's online Lobbyist Registration Application allows lobbyists and clients to register and report 24 hours a day via the Internet. Electronic filers can view the status of their filings online and make necessary changes immediately.

The Commission continually implements changes to make the system user friendly and logical to use for lobbyist, clients and public corporations. Future enhancements to the system include a forgotten password feature and autosave.

**Issues:**

Yearly Maintenance Fee (\$14,300) - Annual maintenance provided by an outside consultant could be taken over if CPI hires a programmer.

**Population Served:**

Lobbyist, Clients and Public Corporations - Total as of July 2008 is 10,000

**Performance Measures:**

95% of Lobbyists and 55% of Clients now utilize electronic filings to submit their registrations and reports. Since 2003, over 145,000 electronic filings have been processed by the application. There is no longer a significant backlog within the Commission's data entry Unit delaying disclosure of lobbying information to the public. A "forgotten password" feature will save significant processing time for staff (175 resends last year) and reduce help desk calls.

NYS COMMISSION ON PUBLIC INTEGRITY  
PROGRAM INFORMATION SHEET

**Program:** Information Technology: Data Entry/Scanning

**Mandate:**

The Lobbying Act requires that all information provided by lobbyist, clients and public corporations be made available online.

**Mandated Funding Level:** NONE

**Brief Description/History/Background:**

Data entry staff enter all PDF forms received at the Commission. Currently it is not mandatory for Lobbyists, Clients and Public Corporations to file electronically. However, CPI is required by statute to make all filings available to the Public on its website. In addition, the data entry staff scan contracts that are mailed to the Commission, which are required to be attached to respective Lobbyist Registration or Registration Amendment.

**Issues:**

Mandating electronic filing by lobbyists would eliminate significant time required by staff for data entry and scanning. This would require legislation.

**Population Served:**

Lobbyist, Clients and Public Corporations, Commission Staff

**Performance Measures:**

Current statistics for 2007 indicate that 95% of lobbyists and 55% of Clients file on-line. IT staff entered approximately 4,250 pdf forms for 2007 and scanned 2,900 contracts or contract amendments to attach to registrations or amendments. In addition, IT staff scanned in approximately 1,750 documents at the request of program staff into the application.

**NYS COMMISSION ON PUBLIC INTEGRITY  
PROGRAM INFORMATION SHEET**

**Program:** Information Technology: Maintaining Lob, Client and Pub Corp (HarCopy)Records

**Mandate:**

The lobbying Act requires that the Commission maintain lobbyist, client and public corporation records for 3 to 6 years.

**Mandated Funding Level:** NONE

**Brief Description/History/Background:**

Maintaining the Commission's pdf and electronic filings. Currently, these records are required to be retained for 3 to 6 years.

**Issues:**

Mandating electronic filing by filers would eliminate staff time spent on maintaining hard copy filings. This would require legislation.

**Population Served:**

Staff, Lobbyist, Clients and Public Corps.

**Performance Measures:**

Filed over 5,000 pdf forms, 1,000 pieces of correspondence and processed approximately 475 requests from staff for files.

**NYS COMMISSION ON PUBLIC INTEGRITY  
PROGRAM INFORMATION SHEET**

**Program:** Information Technology: Financial Disclosure (FDS) Programming and Maintenance

**Mandate:** None

**Mandated Funding Level:** NONE

**Brief Description/History/Background:**

State employees that meet a filing threshold or have been designated as policy makers are required to submit a Filing Disclosure Statement once a year. It is not mandatory that this form be submitted on-line. The commission feels it is necessary to completely modify this system as soon as possible in order to implement cost saving features and provide users with a more user friendly application. The Commission would like to implement new enhancements to the application that include making the FDS available 24/7, provide users with the option to amend their filings and, most importantly, send all user names and passwords that are currently generated by the application, via e-mail instead of via postal mail.

**Issues:**

Currently the FDS application is supported by the Department of State. Unfortunately, there is only one DOS staff member with knowledge of this program to provide support and when that person is on leave, the program has no support. The Commission has plans to take over the responsibility of supporting this application but cannot do so unless a second Information Technology Specialist (Programmer) is hired to support this project. Supporting this application in-house would provide the following benefits: The Commission would no longer need to pay the Department of State for the support of this application and a new electronic secure password feature could be implemented which will save approximately \$45,000 a year in mailing costs. Additional benefits would include the ability to take over the support and maintenance of the Lobbyist On-Line Registration Application which would account for \$14,500 in annual maintenance savings and the cost of any future application modifications.

**Population Served:**

26,000 state workers filing FDS statements

**Performance Measures:**

More than 26,000 people filed financial disclosure statements in 2007, with 84% filing electronically.

NYS COMMISSION ON PUBLIC INTEGRITY  
PROGRAM INFORMATION SHEET

**Program:** Information Technology: On-Line Filings Check Processing

**Mandate:**

The Lobbying Act requires that all lobbyists and clients submit fees with their filings.

**Mandated Funding Level:** NONE

**Brief Description/History/Background:**

The information technology Unit process the fees associated with On-Line registration, registration amendments and client semi annual report forms. Staff assigned to this task approve the check, print a sequential number generated by the application on the back of the check, scan the check and then print out a daily remittance report for processing. Since the implementation of this enhancement in 2005, staff time to process checks has been significantly reduced.

**Issues:**

**Population Served:**

Commission staff and State of NY

**Performance Measures:**

The above program has reduced the amount of time that staff process checks from 1 month to approximately 4 days. The total number of checks processed for 2007 were 1,875.

NYS COMMISSION ON PUBLIC INTEGRITY  
PROGRAM INFORMATION SHEET

**Program:** Information Technology: Network Administration and IT Support

**Mandate:** NONE

**Mandated Funding Level:** NONE

**Brief Description/History/Background:**

Currently the CPI IT Unit handles basic network administration and support for internal staff. This includes setting up hardware and installing software, network monitoring and general support issues. After the transition of all IT duties from the Department of State in September 2008, this support will expand. Additional duties will include, but are not limited to, the following tasks: Network Administration and Monitoring, Network Security, Backup and Recovery of Data, Inventory and IT Purchasing, Printer Maintenance, Software Licensing and Hardware Maintenance.

**Issues:**

Cost savings to the State will be the personal service charges for the 4-5 DOS staff that were being charged to CPI. In FY 07-08 this charge ranged from \$9,300-\$11,500 per payperiod.

**Population Served:**

Staff

**Performance Measures:**

Current Stats are not available since all IT related duties have not transitioned from the Department of State. It should be noted that even though we did not have the primary responsibility for IT support for internal Staff, the CPI IT Unit resolved approximately 200 issues for the first half of 2008.

**NYS COMMISSION ON PUBLIC INTEGRITY  
PROGRAM INFORMATION SHEET**

**Program:** Information Technology:Help Desk - External Users

**Mandate:** NONE

**Mandated Funding Level:** NONE

**Brief Description/History/Background:**

The Commission provides help desk support for all external users. The external help desk has shown a steady increase in calls received and resolved since its inception in 2005. Calls are received from lobbyist, clients and public corporations in regard to the Commission's On-Line Registration Application. All calls received are resolved by the staff receiving the initial call; calls of a much more technical nature are escalated to upper level IT Staff. Examples of calls include help with the On-Line Lobbyist Query, general filing requirements and password problems for the Financial Disclosure System and the Lobbyist On-Line Registration Application. The help desk is available Monday thru Friday from 8:00 - 4:30.

**Issues:**

Staff time dedicated to the external help desk is steadily increasing and taking time away from other IT related duties. If calls continue to increase, the IT Unit may have to prioritize this service as compared to other services and allocate accordingly.

**Population Served:**

Lobbyist, Clients, Public Corporations Total - Approximately 10,000, State Employees Total - 26,000 and the General Public.

**Performance Measures:**

External help desk calls received from Jan 07-July 07 compared to the same time period in 2008 have increased by 78%.

NYS COMMISSION ON PUBLIC INTEGRITY

**PROGRAM INFORMATION SHEET**

**Program:** Information Technology: Help Desk Internal

**Mandate:** NONE

**Mandated Funding Level:** NONE

**Brief Description/History/Background:**

The Commission's IT Unit provides help desk support for all internal staff. Created in 2007 this help desk has become a vital part of the IT Unit. Calls are resolved in a quicker time frame and, if necessary, escalated to other IT staff. Staff can now prioritize calls and work together to resolve issues. Examples of calls consist of e-mail problems, printer problems, hardware setup problems and troubleshooting.

**Issues:**

**Population Served:**

CPI Staff

**Performance Measures:**

200 calls received and resolved for January 08 - June 2008, compared to 54 calls for the same time period in 2007.

NYS COMMISSION ON PUBLIC INTEGRITY  
PROGRAM INFORMATION SHEET

**Program:** Information Technology: Cyber Security Policy Implementation, Monitoring and

**Mandate:**

Cyber Security Policy P003 - 002 - Information Security Policy

**Mandated Funding Level:** NONE

**Brief Description/History/Background:**

Monitoring and Implementation of Cyber Security Policy P003-002 minimum Security requirements. Compliance with these security requirements is mandatory and includes educating staff, reporting incidents and maintaining policies, controls and best practices to meet established guidelines. Other tasks included in this Program include: Information Security, Intrusion Detection and Vulnerability Scanning, Computer Backup and Recovery and the Development and Implementation of a Business Continuity and Disaster Recovery Plan. Currently the IT Unit does not handle these responsibilities but is in the process of taking them over when the transition of duties from the Department of State is completed within the next month.

**Issues:**

**Population Served:**

General Public and Staff

**Performance Measures:**

Required Reporting to CSCIC

NYS COMMISSION ON PUBLIC INTEGRITY  
PROGRAM INFORMATION SHEET

**Program:** Information Technology: Office Inventory

**Mandate:**

**Mandated Funding Level:** NONE

**Brief Description/History/Background:**

The Commission's IT Unit is responsible for the development and maintenance of an Access database that keeps track of all Commission office Inventory. This includes new, current and surplus equipment. Inventory Reports with equipment #, description and office location can be printed upon request.

**Issues:** NONE

Although the Lobby Commission had an electronic inventory database, DOS had never created one for the Ethics Commission. With the merger of the two commissions and the substantial purchasing of new furniture and equipment for the new offices located on Broadway, there is a tremendous amount of data entry work required to bring the inventory up to date. After the initial entry of this new inventory, the amount of staff time to maintain this database will significantly decrease.

**Population Served:** Commission Staff

**Performance Measures:**

Ability to account for all furniture and equipment.

NYS COMMISSION ON PUBLIC INTEGRITY  
PROGRAM INFORMATION SHEET

**Program:** Information Technology:Webcasting Executive Order #3

**Mandate:** Executive Order #3

**Mandated Funding Level:** NONE

**Brief Description/History/Background:**

Per Executive Order #3, all meetings subject to the Open Meetings Law need to be webcast. The Commission has purchased equipment to meet the requirements for meeting Executive Order #3. Services that are being provided by an outside source include streaming, closed captioning and archiving.

**Issues:**

The price for webcasting a meeting is very expensive. To reduce recurring costs, the Commission purchased its own equipment and has trained IT staff to operate this equipment. However, other required features such as closed captioning, encoding, archiving, streaming and recording cost \$1000-\$2000 per meeting. However, since "live viewing" audiences are averaging only 14 viewers per meeting, this requirement does not appear to be very cost effective. The Commission is required to hold a minimum of 6 public meetings annually.

**Population Served:**

General Public

**Performance Measures:**

Stats for the number of people who watch the webcasts. In 2007, the Commission held 3 meetings that were webcast. The average number of live viewers or viewers watching taped webcasts has been 14 per meeting.

Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Legal Programs: E-mail & Telephonic Guidance

**Mandate:**

Executive Law §94(9)(j); (15); (16) ( c )

**Mandated Funding Level:**

none

**Brief Description/History/Background:**

Respond to questions/e-mails from individuals subject to our jurisdiction as well as the general public, ethics officers, other states and localities regarding the interpretation and application of NYS Ethics/Lobbying laws.

**Issues:**

Providing information and guidance to the State workforce on a daily basis is directly related to the critical and vital mission of the Commission. Failure to meet the informational/educational needs of those over which we have jurisdiction would not only result in a significant increase in non-compliance but serve to undermine the integrity of this operation.

**Population Served:**

State workforce; general public; other jurisdictions.

**Performance Measures:**

Number/frequency of responses. Approximately 5 to 10 calls per attorney per week. Statutory changes have caused greater call frequency.

Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Legal Unit: NORC Hearings

**Mandate:**  
Executive Law §94

**Mandated Funding Level:**

**Brief Description/History/Background:**  
ALJ (Hearing Examiner) holds hearings, followed by Commission review and determination.

**Issues:**

**Population Served:**  
All Executive Department employees, lobbyists, clients and public.

**Performance Measures:**  
Number/frequency of hearings, appeals and litigation challenges. Approximately 25 NORCS currently pending.

Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Legal unit: Informal Opinions

**Mandate:**  
CPI resolutions

**Mandated Funding Level:**  
none

**Brief Description/History/Background:**  
Staff's unofficial response to Ethics and Lobbying inquiries. Very useful for quick response, provides a service to requestors, not binding but formal opinion may also be requested.

**Issues:**  
Authorization in statute?/Response Time/Correctness  
Doing an informal opinion cuts down on staff and processing time.

**Population Served:**  
All State employees, Public Officials, State contractors, vendors, lobbyists and clients.

**Performance Measures:**  
Correctness/Response Time/Clarity. Approximately 45 requests pending. In 2007, there were 62 informal opinions.

Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Legal unit: Formal Opinions

**Mandate:**

Executive Law §94(15), Basic requirement, statute

**Mandated Funding Level:**

none

**Brief Description/History/Background:**

A major purpose of the law is to provide Commission Opinions, either upon requests by constituents of Commission or on self determination of need. Has been necessary and effective. Needed for guidance for staff and constituents.

**Issues:**

Time, consensus, publication, correctness

**Population Served:**

All State employees, Public Officials, State contractors, vendors, lobbyists and clients.

**Performance Measures:**

Correctness/Response time/Clarity/Subsequent legal challenges. Anticipate 6 to 8 opinion requests this year.

Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Legal Unit: Legislative Proposals

**Mandate:**

Section 94 (9) (l) of the Executive Law and Section 1-d(g) of the Legislative Law require that the Commission prepare an annual report to the Governor and legislature recommending changes in the law.

**Mandated Funding Level:**

None

**Brief Description/History/Background:**

Since the inception of the Ethics in Government Act of 1987, the Commission has sought introduction of legislation aimed at increasing the overall effectiveness of the State's Ethics Laws. Similarly, since the inception of the Lobbying Act in 1978, the Lobby Commission has made legislative recommendations to increase the effectiveness of the Lobbying Act. Both Laws have been significantly amended over their existence culminating with the merging of the two laws in the Public Employees Ethics Reform Act in 2007.

**Issues:**

Legislative proposals seek to address, define and clarify issues associated with the current law in an effort to enhance its overall effectiveness. The 2007 amendments have raised questions and issues which may require further legislation.

**Population Served:**

NYS workforce

**Performance Measures:**

Number/quality of legislative proposals and number/percentage of bills adopted. 7 legislative proposals were made to the Ethics Law, 5 were incorporated into PEERA. 10 Legislative Recommendations were made to the Lobbying Act; 4 were incorporated into Chapter 1, Laws of 2005 and PEERA. No recommendations were made in 2007, due to the passage of PEERA in May 2007. As mentioned in Issues, we anticipate making recommendations to address issues and questions pertaining to the new law.

Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Legal Unit: Court Litigation

**Mandate:**  
Executive Law §94

**Mandated Funding Level:**  
none

**Brief Description/History/Background:**  
Defend CPI actions

**Issues:**  
Require a large amount of legal staff time.

**Population Served:**  
People of State of New York

**Performance Measures:**  
Anticipate 3 to 5 litigation matters

Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Legal Unit: FDS Exemptions

**Mandate:**

19 NYCRR Part 935, Executive Law §94(9)(k)

**Mandated Funding Level:**

none

**Brief Description/History/Background:**

Statute authorizes non-policymakers who file an FDS to seek an exemption from filing such form. Statute and regulations require the Commission to approve/deny such request based on objection criteria. Regs first promulgated 1989. Approximately 350 exemption requests were processed in 2007.

**Issues:**

Inability to apply for an exemption may result in an increase in non-compliance, resulting in more administrative hearings.

**Population Served:**

Non-policymaker employees who file annual statements of financial disclosure.

**Performance Measures:**

Number of requests processed and response time, appeals and litigation challenges. Expect approximately 350-375 exemption requests.

Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Legal Unit: Requests to Delete Information from FDS Filing ("PAC") Requests

**Mandate:**

19 NYCRR Part 941, Executive Law §94(17)

**Mandated Funding Level:**

none

**Brief Description/History/Background:**

Regulation was first promulgated in 1990 and recently amended in 2008 to reflect significant changes to the law. This program allows required FDS filers to have certain information redacted from the FDS form before it is made available for inspection and copying. The former State Ethics Commission received approximately 150 to 200 requests per year. The Commission expects this number to significantly increase as FDS forms have become more widely available (i.e. copying) pursuant to the 2007 statutory changes.

**Issues:**

**Population Served:**

27,000 required FDS filers.

**Performance Measures:**

Number of requests processed, number/percentage of appeals or litigation challenges.  
Anticipate more than 500 requests this year.

Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Legal Unit; Legal review of Audit Referrals from Program Units

**Mandate:**  
Executive Law §94(9)

**Mandated Funding Level:**  
none

**Brief Description/History/Background:**

Referrals are made by Program staff to the Legal staff following audits of FDS and Lobbying filings for accuracy, completeness and compliance with applicable laws and regulations. Legal Staff provide advice and recommendations for follow up action.

**Issues:**

**Population Served:**

All Executive Department employees and NYS residents

**Performance Measures:**

Accuracy of FDS filings; number of filings audited. In 2008, 7,000 filings have been reviewed and 91 notice letters sent out.

Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Legal Unit: Outside Activity Requests

**Mandate:**

19 NYCRR Part 932 Executive Law §94(16)

**Mandated Funding Level:**

none

**Brief Description/History/Background:**

Individuals designated policy-makers who will receive + \$4,000 engaged in an outside activity must receive the approval of the appointing authority and the Commission before engaging in such activity. Regulations first promulgated in 1990. In calendar year 2007, the Commission processed 170 outside activity requests. For 2008, 205 requests have been processed to date.

**Issues:**

Failure to receive proper authorization could result in ethics violations; increase in hearings, etc.

**Population Served:**

Individuals designated policy-makers by their appointing authority.

**Performance Measures:**

205 requests processed to date in 2008.

Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Legal Unit:Regulatory Actions

**Mandate:**

Executive Law §94(9); (13); (16)(a)

**Mandated Funding Level:**

none

**Brief Description/History/Background:**

Commission is required by statute to promulgate, amend and adopt regulations commensurate with its jurisdictional duties. Statute first enacted in 1987; amendments in 2007. Regulations first promulgated 1989. Emergency rulemaking for 19 NYCRR Part 941 promulgated July 2008.

**Issues:**

Changes to the statutory authority of the Commission has necessitated a complete regulatory review as well as the drafting and promulgation of new regulations (gifts; policymakers). Employees must also be made aware of the changes in order to comply with the current law.

**Population Served:**

NYS workforce

**Performance Measures:**

In the process of reviewing and revising all regulations. This will require input from two staff attorneys, General Counsel and Executive Director; subject to Commission review and public comment.

Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Legal Unit:FOIL Requests/Inspections

**Mandate:**

19 NYCRR Part 937, Executive Law 94(17), POL Article 6

**Mandated Funding Level:**

none

**Brief Description/History/Background:**

The Legal unit reviews all FDS filings prior to release/availability for inspection along with redaction of category of value in accordance with statute. These regulations were first promulgated in 1989. Changes to the existing legislation will require significant amendments to the regulations.

**Issues:**

Failure to comply with these requests could result in statutory non-compliance and subsequent litigation.

**Population Served:**

Local, State and federal government agencies as well as the general public.

**Performance Measures:**

Number of requests, responses and time for completing such responses, number/frequency of appeals or litigation challenges. Anticipate 300-500 requests.

Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Legal Programs: CLE Training

**Mandate:**

Provide relevant, useful legal education regarding POL issues and Legislative issues to NYS Attorneys, Ethics Officers, lobbyists and clients.

**Mandated Funding Level:**

none

**Brief Description/History/Background:**

CPI Attorneys have and will continue to provide legal education to its constituents so to provide a clear understanding of the law and its applications to all the areas and issues it covers.

**Issues:**

1.) Number of CPI attorneys available to meet need 2.) Educating CPI attorneys on all parts of POL and Legislative Law

**Population Served:**

All

**Performance Measures:**

1.) Number of programs provided 2.) Number of constituents served 3.) Evaluations of each presentation 4.) Improvement

In 2007, the Commission conducted 16 CLE sessions for 458 attendees.

Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Legal Unit: Honoraria Reports

**Mandate:**

19 NYCRR Part 930; POL §73(5-a)(b)

**Mandated Funding Level:**

**Brief Description/History/Background:**

By June 1 of each year, state agencies must file with the Commission, a compilation kept of all honoraria previously approved by the appointing authority. The Commission reviews these reports to insure there are no conflicts of interest or payments from disqualified sources. Regulation first promulgated in 1989.

**Issues:**

Only a small percentage of State employees engage in this activity annually. Over time, failure to audit these reports could result in an increase in ethics violations.

**Population Served:**

Full-time State officers and employees.

**Performance Measures:**

Anticipate 225 reports.

New York State Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Investigations: Compliance Audits

**Mandate:**

Legislative Law §1-d(b)

**Mandated Funding Level:**

N/A

**Brief Description/History/Background:**

Effective January 1, 2000, the Lobbying Act gave the Lobby Commission the power to conduct a program of random audits of statements and reports filed by lobbyists and clients and stipulated the manner the program was to be carried out. The Act further required that the Commission contract with an outside accounting entity to monitor the process and certify that such process complies with this statute. The Public Employee Ethics Reform Act of 2007 was enacted pursuant to Chapter 14 of Laws of 2007, effective September 24, 2007, and mandated that this program be continued by the Commission on Public Integrity.

**Issues:**

The Commission is required to contract with an outside accounting entity to monitor and certify this process. A special application run by a retained outside company runs the selection process to guarantee that it is totally random.

**Population Served:**

The Commission conducts compliance audits of lobbyists and their clients, as defined in Legislative Law §1-d. In 2008, there are currently 6,051 lobbyists, 3,845 clients and 54 public corporations. Filings can be randomly selected for audit for a period of 3 years from the date of filing.

**Performance Measures:**

Since the inception of this program in 2000, the Commission has conducted an average of 227 audits per year, ranging from 8 to 448. A number of audits are referred for investigation based on significant findings found during the audit. Historically, the number of compliance audits has increased from year to year due to an increase in resources and emphasis on the program.

New York State Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Investigations Unit: Investigation Cases

**Mandate:**

Executive Law §94(16)(d)

Legislative Law §1-d(a)

**Mandated Funding Level:**

N/A

**Brief Description/History/Background:**

The Ethics in Government Act of 1987 was enacted pursuant to Chapter 813 of the Laws of 1987, effective January 1, 1989, which added §94 to the Executive Law.

**Issues:**

**Population Served:**

The Commission conducts investigations of the four statewide elected officials, as defined in Public Officers Law §73(1)(h), and of all state officers and employees, as defined in Public Officers Law §73(1)(i).

**Performance Measures:**

Over the past 5 years, the former State Ethics Commission has investigated an average of 56.8 cases per year, ranging from 38 to 70. Historically, the number of investigations fluctuates with no discernable pattern. Presently, due to several cases which had placed a heavy demand on resources, there are approximately 90 outstanding cases inherited from the former State Ethics Commission. In addition, approximately 50 cases have been inherited from the former New York Temporary State Commission on Lobbying.

New York State Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Investigation Unit: Random Complaints

**Mandate:**

Executive Law §94(9)(g) and (l)

**Mandated Funding Level:**

N/A

**Brief Description/History/Background:**

The Ethics in Government Act of 1987 was enacted pursuant to Chapter 813 of the Laws of 1987, effective January 1, 1989, which added §94 to the Executive Law. The Public Employee Ethics Reform Act of 2007 was enacted pursuant to Chapter 14 of the Laws of 2007, effective September 24, 2007, which amended §94 to the Executive Law.

**Issues:**

**Population Served:**

Although the Commission's jurisdiction is limited to the four statewide elected officials, as defined in Public Officers Law §73(1)(h), all state officers and employees, as defined in Public Officers Law §73(1)(i), lobbyists and their clients, as defined in Legislative Law §1-c(a) and (b). Historically, the majority of the complaints received by the Commission involve issues which do not fall within the jurisdiction of the Commission or entities and individuals which are outside jurisdiction of the Commission, i.e., private entities, private individuals, officers and employees of the federal and local governments, and individuals with mental health issues.

**Performance Measures:**

Over the past 5 years, the Commission has received an average of 282.6 complaints per year, ranging from 242 to 321. Historically, the number of complaints is relatively steady showing a slight increase with time.

Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** FDS Unit: Policy Maker, Over Threshold and Academic Filings

**Mandate:**

Section 94 of the Executive Law and Section 73-a of the Public Officers law

**Mandated Funding Level:** None

**Brief Description/History/Background:**

Since the inception of the the Ethics Commission in 1989, the financial disclosure unit has been responsible for receiving and storing the financial disclosure statements for required filers of the Executive Department of State Government. The unit reviews all paper forms for completeness, and notifies deficient filers of requirement to complete statement.

**Issues:**

The number of electronic filings has increased substantially in the last 3 years. The electronic system is in dire need of modification for updates to make it more user friendly to staff and FDS filers. These modifications would take advantage of new technology to improve cost effectiveness.

**Population Served:**

Over 27,000 employees of the Executive Department of State Government

**Performance Measures:**

Over 91% of the 22,000 of the May 2008 required filers used the electronic filing system.

Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** FDS Unit: Noncompliance Procedures for Policy Maker, Over Threshold and Academic Filers

**Mandate:**

Section 94 of the Executive Law and Section 73-a of the Public Officers law

**Mandated Funding Level:** None

**Brief Description/History/Background:**

Since the inception of the the Ethics Commission in 1989, the financial disclosure unit has been responsible for pursuing late filers and non-filers as proscribed by Section 94 of the Executive Law. The FDS unit sends 15 day letters and Notices of Delinquencies to all non-filers. It also prepares hearing folders for outstanding delinquent filers and forwards them to Counsel's office for action.

**Issues:**

If we are unable to provide the assurance that required filers have received the necessary documents to file, the number of filers in non compliance will increase.

**Population Served:**

Over 27,000 employees of the Executive Department of State Government

**Performance Measures:**

For the May 2008 filing deadline, 16% of the required 22,000 filers did not comply by the filing deadline. The FDS Unit issued 1900 fifteen day letters to those in noncompliance. The remaining 2.5% who have yet to file will receive Notices of Delinquency. In 2006 and 2007, 9% of the approximately 21,000 filers did not comply with the filing deadline and approximately 1600 fifteen day letters and 333 Notices of Delinquency were issued.

NYS Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** FDS Unit: Filer Update Procedure

**Mandate:**

Section 94 of the Executive Law and Section 73-a of the Public Officers law

**Mandated Funding Level:** None

**Brief Description/History/Background:**

Since the inception of the the Ethics Commission in 1989, the financial disclosure unit has been responsible for entering current data updated by each agency annually each February. In addition, State agencies are asked to annually advise the Commission of other changes to required filer status throughout the year.

**Issues:**

If lists of required filers are not updated annually, CPI cannot verify that the correct persons received the documents required to file their financial disclosure statement each year.

**Population Served:**

Over 27,000 FDS filers within the Executive Department of State Government

**Performance Measures:**

The number of filers who do not comply with their filing deadline will increase if we do not have current ethics officers who will update our database throughout the year. In the most recent filing due May 15, 2008, of the 22,000 people required to file, 84% filed on or before the deadline. Of those, 91% used of the electronic filing system.

Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** FDS Unit: USER ID and Password Letter Mailing to required filers

**Mandate:**

None

**Mandated Funding Level:** None

**Brief Description/History/Background:**

Since 1998, the Commission has mailed USER IDS and passwords in a letter annually to the home addresses of all State employees required to file the Financial Disclosure statement due in May or November of the current year.

**Issues:**

The cost of these mailings (44,000 pieces of mail in April each year and 11,000 in October of each year) is very expensive. Modifying the FDS application through programming would allow for emailing the USER IDS and passwords. In addition, if all State employees were allowed by their agencies to file their forms at their place of employment, the number of paper filings requiring mail service would be minimal.

**Population Served:**

27,000 people in the Executive Department of State Government required to file the financial disclosure statement annually.

**Performance Measures:**

The number of filers who do not comply with their filing deadline will increase if we do not have current ethics officers who will update our database throughout the year. In the most recent filing, 84% of the 22,000 people required to file, filed on or before May 15, 2008. Of those, 91% made use of the electronic filing system.

NYS Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** FDS Unit;Application for Exemption from Reporting or Deletion of Information from Public Inspection

**Mandate:**

Section 94 of the Executive Law and Chapter 14 of the Laws of 2007

**Mandated Funding Level:** None

**Brief Description/History/Background:**

Since the inception of the the Ethics Commission in 1989, the special assistant in the financial disclosure unit has served as the executive assistant to the Public Advisory Counsel. In 2007, the Public Advisory Council was abolished and the duties and powers of the Council were transferred to the Executive Director of the Commission on Public Integrity. All filers required to file the financial disclosure statement each year may apply to the Executive Director for exemption from reporting or deletion of certain information from public versions of their statements. The Special Assistant reviews the applications for completeness, writes summaries of each application for the ED, and makes recommendations. Once the ED issues his decision, the Special Assistant produces the decision and mails it to the applicant.

**Issues:**

Applications need to be processed in a timely manner. It is a time sensitive process since all information that is the subject of the request is unavailable for public inspection purposes until a decision is issued by the ED of the Commission.

**Population Served:**

Over 250,000 employees of the Executive Department of State Government

**Performance Measures:**

The number of applications received by the Commission each year is approximately 25-30.

Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** FDS Unit: Ethics Officers Annual Contact List Update

**Mandate:** None

**Mandated Funding Level:** None

**Brief Description/History/Background:**

It is necessary for the transmittal of information from the Commission to the required entities that an accurate and up to date list of State Agency Ethics Officers be maintained annually. These contacts provide the Commission with the names and addresses of required agency FDS filers that are current and verified by each agency.

**Issues:**

The Commission will be trying to utilize the Ethics Officers this Fall as a conduit between the Commission and the required filers for the transmittal of their USER ID and Passwords to reduce mailing costs. In order for this process to work, the Commission will need the cooperation of agency Ethics Officers.

**Population Served:**

Over 27,000 employees of the Executive Branch of State Government

**Performance Measures:**

The number of filers who do not comply with their filing deadline will increase if we do not have the current names and addresses of ethics officers who will provide updates to the FDS database throughout the year. In the most recent filing due on May 15, 2008, of the 22,000 people required to file, 84% filed on or before May 15, 2008. Of those, 91% made use of the electronic filing system.

NYS Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** FDS Unit: Review and Acceptance of NYC Transit Authority Filers

**Mandate:**  
None

**Mandated Funding Level:** None

**Brief Description/History/Background:**

Since 2001, NYC Transit Authority has submitted an electronic file of all their required filers. Once this file is loaded into our database, updated records show up in a separate database for review by the financial disclosure unit staff for approval of changes in information. There are an average of 800 records reviewed by staff.

**Issues:**

If updated lists of required filers are not maintained, we cannot verify that the correct persons received the necessary documents to file the financial disclosure statement each year. If we omit the review and approval process, old addresses will override updated addresses that we have built into our database.

**Population Served:**

Over 3500 filers from the New York City Transit Authority

**Performance Measures:**

In 2008, the Transit Authority compliance rate was 94%. We issued 215 fifteen day letters and are pursuing the remaining 49 noncompliant filers. In 2007, the compliance rate was 95%. We issued 112 fifteen day letters and 9 Notices of Delinquency.

**New York State Commission on Public Integrity  
PROGRAM INFORMATION SHEET**

**Program:**

Program Unit - Processing Online User ID Requests

**Mandate:**

The Lobbying Act, as amended by the Public Employee Ethics Reform Act of 2007, Sections 1-d (d)

**Mandated Funding Level:**

None

**Brief Description/History/Background:**

The Lobbying Act, as amended by the Public Employee Ethics Reform Act of 2007, mandates the full and complete disclosure of the identities, activities, and expenditures of those attempting to influence the governmental decision-making process in NYS. Further, pursuant to the Act's provisions, the Commission prepares forms, as well as instructions for completing these forms.

All statements and reports required under the Lobbying Act are submitted to the Commission's online filing system for public inspection, either by a filer or Commission staff. A request for an online user id, which generates a user id and password, is required for a filer to file online.

The User ID Request generates an ID Authorization Form (Affidavit), which the user must sign and have notarized, legally allows users to file online by use of electronic signature.

**Issues:**

If the user id request is incomplete/incorrect, the filer is unable to file online. The filer will submit their filings on paper, which requires the Commission's IT Unit to enter the information online, delaying approval which makes it available for public inspection.

Because the Affidavit is considered a "legal" document, Program staff must ensure it is timely processed and filed in a designated binder. Loss of an Affidavit could jeopardize any actions or audits involving an online filer.

**Population Served:**

Number of Lobbyists - 6,051

Number of Client - 3,845

Number of Public Corporations - 54

Approximately 90% of lobbyists, and in excess 50% of clients file online

**Performance Measures:**

To ensure all users of the Commission's online filing system have completed and submitted a valid Electronic Filing Authorization form (Affidavit). In 2007, 825 User IDs and Electronic Filing Authorizations were processed.

**New York State Commission on Public Integrity  
PROGRAM INFORMATION SHEET**

**Program:**

Program Unit - Processing Lobbyist and Public Corporation Statements of Registration and Amendments

**Mandate:**

The Lobbying Act, as amended by the Public Employee Ethics Reform Act of 2007,

**Mandated Funding Level:**

None

**Brief Description/History/Background:**

The Lobbying Act, as amended by the Public Employee Ethics Reform Act of 2007, mandates the full and complete disclosure of the identities, activities, and expenditures of those attempting to influence the governmental decision-making process in NYS. Further, pursuant to the Act's provisions, the Commission prepares forms, as well as instructions for completing these forms.

Every lobbyist who reasonably anticipates exceeding, incurring, or receiving, or actually expends, incurs, or receives, more than \$5,000 of **combined** reportable compensation and expenses for purposes of lobbying during any calendar year, must file a Lobbyist Statement of Registration with the Commission for that period. Once a lobbyist reaches the threshold, they are required to register for any other lobbying client, whether they are paid for lobbying services or not.

A \$200 non-refundable registration fee is required to be submitted with each Lobbyist Statement of Registration filed for the biennial period if a lobbyist anticipates exceeding \$5,000 in compensation and expenses in any year in the biennial period. No registration fee is required to be submitted with a biennial registration if the lobbyist will not exceed \$5,000 in compensation and expenses. Any biennial registration submitted after January 1 of the second calendar year of the biennial period shall be accompanied by a prorated registration fee of \$100.

A copy of a signed, written lobbying agreement must also be submitted. Such agreement must specify what period of the year or biennial period is covered and must disclose the terms and dollar amount of compensation. In the alternative, a written authorization, signed by the chief administrative officer of the client or employer, can be substituted and must be submitted. The terms and amounts of their compensation or salary must be disclosed. Authorizations which are not signed by the Chief Administrative Officer will not be accepted. If such contract/authorization is oral, a statement of the substance must be submitted. (Section 1-e(c)).

If any of the information contained in a filed registration, including the lobbying agreement, changes during the biennial registration period, an amended Lobbyist Statement of Registration form must be completed and filed within 10 days of the change.

**Issues:**

Since all lobbying filings submitted to the Commission are mandated to be fully and completely disclosed to the public, all statutorily-required parts must be complete and correct. This could affect the Unregistered Lobbyist Program, Bimonthly Program, Client Semi-Annual Program, Discrepancy Program, Compliance Unit, Investigation Unit.

**Population Served:**

Number of Lobbyists - 6,051  
Number of Client - 3,845  
Number of Public Corporations - 54

**Performance Measures:**

To ensure all Registrations and Amendments are reviewed; to ensure all contract/authorizations are reviewed and processed; to ensure filing fees are submitted, processed and forwarded to the appropriate unit for deposit; to ensure all Registrations and Amendments are complete/correct, approved for public inspection. If a report is incomplete/incorrect, to ensure the report is corrected in a timely fashion. In 2007, 5983 filings were processed.

**New York State Commission on Public Integrity  
PROGRAM INFORMATION SHEET**

**Program:**

Program Unit - Processing Lobbyist and Public Corporation Bimonthly Reports and Amendments

**Mandate:**

The Lobbying Act, as amended by the Public Employee Ethics Reform Act of 2007, Sections 1-h, i

**Mandated Funding Level:**

None

**Brief Description/History/Background:**

The Lobbying Act, as amended by the Public Employee Ethics Reform Act of 2007, mandates the full and complete disclosure of the identities, activities, and expenditures of those attempting to influence the governmental decision-making process in NYS. Further, pursuant to the Act's provisions, the Commission prepares forms, as well as instructions for completing these forms.

Any lobbyist, required to file a Statement of Registration for a client for any biennial period, must also file a bimonthly report by the 15th day of the month following the end of the bimonthly reporting period in which the lobbyist was first required to register. Subsequent bimonthly reports must be filed by the 15th day of the month following the end of each subsequent bimonthly period thereafter. There is NO minimum threshold requirement for filing any Lobbyist Bimonthly Report. Consequently, all Lobbyist Bimonthly Reports are required to be filed for a registration period.

If any of the information contained in a filed report, including the lobbying agreement, changes, an amended form must be completed and filed.

**Issues:**

Since all lobbying filings submitted to the Commission are mandated to be fully and completely disclosed to the public, all statutorily-required parts must be complete and correct. This could affect the Unregistered Lobbyist Program, Registration Program, Client Semi-Annual Program, Discrepancy Program, Compliance Unit, Investigation Unit.

**Population Served:**

Number of Lobbyists - 6,051  
Number of Client - 3,845  
Number of Public Corporations - 54

**Performance Measures:**

To ensure all Bimonthly Reports and Amendments are reviewed, complete/correct, and approved for public inspection. If a report is incomplete/incorrect, to ensure the report is corrected in a timely fashion. In 2007, 21,601 filings were processed.

**New York State Commission on Public Integrity  
PROGRAM INFORMATION SHEET**

**Program:**

Program Unit - Processing Client Semi-Annual Reports and Amendments

**Mandate:**

The Lobbying Act, as amended by the Public Employee Ethics Reform Act of 2007, Sections 1-j

**Mandated Funding Level:**

None

**Brief Description/History/Background:**

The Lobbying Act, as amended by the Public Employee Ethics Reform Act of 2007, mandates the full and complete disclosure of the identities, activities, and expenditures of those attempting to influence the governmental decision-making process in NYS. Further, pursuant to the Act's provisions, the Commission prepares forms, as well as instructions for completing these forms.

The term "client" shall mean every person or organization who retains, employs or designates any person or organization to carry on lobbying activities on behalf of such client.

Semi-annual reports are required to be filed by any client retaining, employing or designating a lobbyist or lobbyists, whether or not any such lobbyist was required to file a bimonthly report, if it is reasonably anticipated that during the year an amount in excess of \$5,000 of combined reportable compensation and expenses for lobbying will be expended or incurred. If a January through June Client Semi-Annual Report is filed, a second Client Semi-Annual Report is required to be filed for the period of July through December, even if no further monies are expended, unless the contract/authorization with the lobbyist terminated on or before June 30.

The amounts expended, incurred, or received of reportable compensation and expenses for lobbying activities must be computed cumulatively for all lobbying activities when determining whether the thresholds have been met.

Each Client Semi-Annual Report must be accompanied by a \$50 non-refundable filing fee.

**Issues:**

Since all lobbying filings submitted to the Commission are mandated to be fully and completely disclosed to the public, all statutorily-required parts must be complete and correct. This could affect the Unregistered Lobbyist Program, Registration Program, Bimonthly Program, Discrepancy Program, Compliance Unit, Investigation Unit.

**Population Served:**

Number of Lobbyists - 6,051  
Number of Client - 3,845  
Number of Public Corporations - 54

**Performance Measures:**

To ensure all Client Semi-Annual Reports and Amendments are reviewed, complete/correct, and approved for public inspection; to ensure filing fees are submitted, processed and forwarded to the appropriate unit for deposit. If a report is incomplete/incorrect, to ensure the report is corrected in a timely fashion. In 2007, 5,400 client filings were processed.

**New York State Commission on Public Integrity  
PROGRAM INFORMATION SHEET**

**Program:**

Program Unit - Processing Delinquent Filings (Registration, Bimonthly, Client Semi-Annual, Amendments)

**Mandate:**

The Lobbying Act, as amended by the Public Employee Ethics Reform Act of 2007, Sections 1-e, g, h, i, j

**Mandated Funding Level:**

None

**Brief Description/History/Background:**

The Lobbying Act, as amended by the Public Employee Ethics Reform Act of 2007, mandates the full and complete disclosure of the identities, activities, and expenditures of those attempting to influence the governmental decision-making process in NYS. Further, pursuant to the Act's provisions, the Commission prepares forms, as well as instructions for completing these forms.

Each section referenced above (Mandate) requires the filing of Statements of Registration, Bimonthly Reports, Client Semi-Annual Reports, Amendments, and Terminations.

The commission may impose a fee for late filing of a report not to exceed twenty-five dollars for each day that the report required to be filed is late, except that if the late filing has not previously been required by statute to file said report, the fee for late filing shall not exceed ten dollars for each day that the report required to be filed is late.

**Issues:**

Since all lobbying filings submitted to the Commission are mandated to be fully and completely disclosed to the public, all statutorily-required reports must be filed. This could affect the Unregistered Lobbyist Program, Registration Program, Bimonthly Program, Client Semi-Annual Program, Discrepancy Program, Late Fee Program, Compliance Unit, Investigation Unit.

**Population Served:**

Number of Lobbyists - 6,051  
Number of Client - 3,845  
Number of Public Corporations - 54

**Performance Measures:**

To ensure all statutorily-required reports are filed; to ensure Failure-to-File or 15-Day letters are sent within a reasonable timeframe, and responses received; to ensure "late" filings are referred to the appropriate Unit for processing; to ensure those filers that have "failed to file" are referred to the appropriate Unit for processing. In 2007, 328 Failure to File cases were processed.

**New York State Commission on Public Integrity  
PROGRAM INFORMATION SHEET**

**Program:**

Program Unit - Processing Terminations (Lobbyist, Client, Public Corporation)

**Mandate:**

The Lobbying Act, as amended by the Public Employee Ethics Reform Act of 2007, Sections 1-g

**Mandated Funding Level:**

None

**Brief Description/History/Background:**

The Lobbying Act, as amended by the Public Employee Ethics Reform Act of 2007, mandates the full and complete disclosure of the identities, activities, and expenditures of those attempting to influence the governmental decision-making process in NYS. Further, pursuant to the Act's provisions, the Commission prepares forms, as well as instructions for completing these forms.

Lobbyists, clients and public corporations are required to send a written notification of the terms of the termination of lobbying services within 30 days. In addition, all required reports must still be filed, covering all lobbying activity up to the effective date of such termination, by their statutory due dates.

**Issues:**

Since all lobbying filings submitted to the Commission are mandated to be fully and completely disclosed to the public, all statutorily-required reports must be filed. This could affect the Unregistered Lobbyist Program, Registration Program, Bimonthly Program, Client Semi-Annual Program, Discrepancy Program, Late Fee Program, Compliance Unit, Investigation Unit.

**Population Served:**

Number of Lobbyists - 6,051  
Number of Client - 3,845  
Number of Public Corporations - 54

**Performance Measures:**

To ensure lobbyists, clients and public corporations properly file notices of termination within designated timeframe; to ensure all statutorily-required filings are filed through termination date. In 2007, 2,320 terminations were processed.

**New York State Commission on Public Integrity  
PROGRAM INFORMATION SHEET**

**Program:**

Program Unit - Processing Designation Letters

**Mandate:**

The Lobbying Act, as amended by the Public Employee Ethics Reform Act of 2007, Sections 1-c, e, g, h, i, j, l, o

**Mandated Funding Level:**

None

**Brief Description/History/Background:**

The Lobbying Act, as amended by the Public Employee Ethics Reform Act of 2007, mandates the full and complete disclosure of the identities, activities, and expenditures of those attempting to influence the governmental decision-making process in NYS. Further, pursuant to the Act's provisions, the Commission prepares forms, as well as instructions for completing these forms.

All statements and reports required under the Lobbying Act are subject to a declaration by the person making and filing such statement and report that the information is true, correct and complete to the best knowledge and belief of the signer under the penalties of perjury. The filing must be signed by a principal lobbyist or, in the case of an organization, the Chief Administrative Officer. Otherwise, any other person deemed responsible for making and filing any statement or report must be "designated" in writing to do so by the Chief Administrative Officer, or person with authority.

**Issues:**

Since all lobbying filings submitted to the Commission are mandated to be fully and completely disclosed, if the "declaration" is incomplete/incorrect, the filing cannot be publicly disclosed.

**Population Served:**

Number of Lobbyists - 6,051

Number of Client - 3,845

Number of Public Corporations - 54

Depends on number of PDF filings (does not apply to those filing online)

**Performance Measures:**

**Attachment C**

To ensure all individuals designated by a Chief Administrative Officer, or person with authority, to make and sign statement(s) and/or report(s), has been made in writing; to ensure the designated individual has accepted such designation, specifying which statement(s) and/or report(s) are covered as well as the specific year or biennial period; to ensure all filings are fully and completely disclosed to the public within a reasonable amount of time. In 2007, 242 Designation letters were processed.

**New York State Commission on Public Integrity  
PROGRAM INFORMATION SHEET**

**Program:**

Program Unit - Compliance Audit Protocols

**Mandate:**

The Lobbying Act, as amended by the Public Employee Ethics Reform Act of 2007, Section 1-d (b)

**Mandated Funding Level:**

None

**Brief Description/History/Background:**

The commission randomly selects reports or registration statements required to be filed by lobbyists or clients pursuant to this article for audit. Such random audits may require the production of books, papers, records or memoranda relevant and material to the preparation of the selected statements or reports, for examination by the commission. Upon completion of a random audit conducted in accordance with the Act, the commission shall determine whether there is reasonable cause to believe that any such statement or report is inaccurate or incomplete. Upon a determination that such reasonable cause exists, the commission may require the production of further books, records or memoranda, to the extent the commission determines such actions are necessary to obtain information relevant and material to investigating such inaccuracies or omissions.

The Compliance Unit may direct a filer to submit additional information and/or amended filings, per the audit review. Since Program staff reviews lobbying related filings (including amendments), the Program Unit and Compliance Unit must work together to ensure requested filings, per audit review, are reviewed and processed.

**Issues:**

If a requested filing is not received, it affects the Compliance Unit's random audit process. It could also cause a discrepancy between the lobbyist and client filings.

**Population Served:**

Number of Lobbyists - 6,051  
Number of Client - 3,845  
Number of Public Corporations - 54  
Approximately 15% of filers are randomly audited

**Performance Measures:**

To ensure when amendments and/or missing materials are requested as the result of a compliance audit, Program follows procedures relative to the Compliance Audit Process/Protocols - ensuring the filing is submitted, and the Compliance Unit is notified of the filing status (filed or not).

New York State Commission on Public Integrity  
PROGRAM INFORMATION SHEET

**Program:**

Special Operations Unit - Late Fee Program

**Mandate:**

The Lobbying Act, as amended by the Public Employees Ethics Reform Act of 2007, Section 1-e (7) (e) (iv)

The Lobbying Act, as amended by the Public Employees Ethics Reform Act of 2007, Section 1-h (c) (3)

The Lobbying Act, as amended by the Public Employees Ethics Reform Act of 2007, Section 1-i (c) (3)

The Lobbying Act, as amended by the Public Employees Ethics Reform Act of 2007, Section 1-j (c) (3)

The Lobbying Act, as amended by the Public Employees Ethics Reform Act of 2007, Section 1-l, (d)

**Mandated Funding Level:**

NONE

**Brief Description/History/Background:**

Program staff assess late fees to lobbyists, clients and public corporations that fail to file reports in a timely fashion. These late filers are notified in writing and fees are collected and deposited into the General Fund. Over \$114,000 in late fees were paid in the 2007 calendar year.

**Issues:**

This program makes lobbyists and clients aware of filing due dates while, at the same time, generates a significant source of revenue to the state. It also serves as a less expensive and time-consuming process of assessing fines to those who have not filed on time as compared to the civil penalty hearing process. This process is being utilized more frequently by CPI since the September 2007 merger.

**Population Served:**

6051 Lobbyists, 3845 Clients, 54 Public Corporations

**Performance Measures:**

Late fees paid in 2005	\$11,770
Late fees paid in 2006	\$23,232
Late fees paid in 2007	\$114,823

New York State Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:**

Special Operations Unit: Auditing of FDS Filings

**Mandate:**

Executive Law, Section 94 (9)(f)

**Mandated Funding Level:**

NONE

**Brief Description/History/Background:**

Staff reviews and analyzes financial disclosure statements to verify filers are reporting accurately. If issues are noted, notices are sent by staff to resolve.

**Issues:**

Without running this report, FDS filers might be in violation of the law and would never be detected or notified.

**Population Served:**

27,000 FDS filers

**Performance Measures:**

All financial disclosure statements have been reviewed and addressed in a timely fashion.

2006 FDS Filings reviewed and analyzed by staff : 7,000

Notification Letters sent: 91

New York State Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:**

Special Operations Unit - Lobbyist Disbursement of Public Monies

**Mandate:**

The Lobbying Act, as amended by the Public Employee Ethics Reform Act of 2007, Section 1-l

**Mandated Funding Level:**

NONE

**Brief Description/History/Background:**

The Lobby Act, as amended by the Public Employee Ethics Reform Act of 2007, mandates that the Commission on Public Integrity provide full and complete disclosure as to the identities, activities, and expenditures of those attempting to influence the governmental decision-making process in New York State on both the state and local government levels. Further, pursuant to the Act's provisions, the Commission prepares forms, as well as instructions for completing these forms.

Beginning January 1, 2008, any lobbyist required to file a Statement of Registration with the Commission who in any lobbying year reasonably anticipates that during the year they will expend, incur or receive combined reportable compensation and expenses in an amount in excess of \$5,000 in connection with any attempts to influence a determination by a public official, or by a person or entity working in cooperation with a public official, with respect to the solicitation, award or administration of a grant, loan, or agreement involving the disbursement of public monies in excess of \$15,000, will be required to file a Lobbyist Disbursement of Public Monies Report. (Lobbying Act Section 1-l)

**Issues:**

Since all lobbying filings submitted to the Commission are mandated to be fully and completely disclosed to the public, all statutorily-required parts must be complete and correct. This new requirement could, in turn, affect the Unregistered Lobbyist Program, Registration Program, Bimonthly Program, Discrepancy Program, Compliance Unit, Investigation Unit.

**Population Served:**

6051 Lobbyists

**Performance Measures:**

To ensure all Lobbyist Disbursement of Public Monies Reports and Amendments are reviewed, complete/correct, and available for public inspection.

New York State Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:**

Special Operations Unit - Legislative Unregistered Lobbying Inquiry

**Mandate:**

The Lobbying Act, as amended by the Public Employee Ethics Reform Act of 2007, mandates that the Commission on Public Integrity provide full and complete disclosure as to the identities, activities, and expenditures of those attempting to influence the governmental decision-making process in New York State on both the state and local government levels.

**Mandated Funding Level:**

NONE

**Brief Description/History/Background:**

Throughout the year, on a daily basis, Program staff will review media for advertisements, events and news stories which indicate lobbying activity. If there is evidence of unregistered lobbying activity involving an attempt to influence the passage or defeat of legislation by the Legislature or the approval or veto of legislation by the Governor, an official inquiry letter is sent to gather additional information to make a determination of need to register.

**Issues:**

Unregistered lobbyists will continue to lobby without being properly registered with the State of New York without being notified by the Commission. The Public will not be aware of these activities.

**Population Served:**

Unregistered Lobbyists

**Performance Measures:**

Official Inquiry Letters sent out in 2006	106
Lobbyists registered with the Commission	9
Official Inquiry Letters sent out in 2007	87
Lobbyists registered with the Commission	6

New York State Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:**

Special Operations Unit - The Discrepancy Program

**Mandate:**

The Lobbying Act, as amended by the Public Employees Ethics Reform Act of 2007, Section 1-p (b)

**Mandated Funding Level:**

NONE

**Brief Description/History/Background:**

Program staff compare Lobbyist Bimonthly Report filings with Client Semi-Annual Report filings to note discrepancies in compensation reported by lobbyists with that reported by their respective clients. A report produced by the online application generates the initial listing of discrepancies that staff utilize for identifying discrepancies that require further inquiry.

**Issues:**

Without running this report, information that is available to the public may be incorrect and misleading. This report generates a lot of false positives that must be resolved manually by staff. Modifications to the lobbyist online application are in process for this Fall to increase the reliability of this report, decrease manual review by staff and decrease processing time.

**Population Served:**

6051 Lobbyists, 3845 Clients, 54 Public Corporations

**Performance Measures:**

To ensure that all filings are reviewed, complete/correct and approved for public inspection in a timely fashion.

Discrepancies resolved in 2006	301
Discrepancies resolved in 2007	428

New York State Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:**

Special Operations Unit - Section 166

**Mandate:**

The Lobbying Act, as amended by the Public Employee Ethics Reform Act of 2007, Section 1-q

Executive Law, Section 166

**Mandated Funding Level:**

NONE

**Brief Description/History/Background:**

Section 1-q record of appearances. The Commission shall promulgate all rules or regulations and any procedures, forms, or instructions necessary to implement the provisions of section one hundred sixty-six of the executive law relating to the quarterly filing of the record of appearances before regulatory agencies.

Assigned staff reviews notices of appearances from state agencies for lobbying activity. If there is evidence of unregistered lobbying activity, an official inquiry letter is sent for additional information.

**Issues:**

Although the Commission is only required to collect/store section 166 record of appearances, staff review each form to ensure all lobbying activity has accurately been recorded with the Commission. By not reviewing these forms, it leaves the Commission vulnerable as to why the forms have not been looked at to verify such information. This is a labor intensive program.

**Population Served:**

The following New York State agencies required to file notice of appearance forms with the Commission under Section 166 of the Executive Law, are listed below:

Department of Agriculture and Markets  
Banking Department  
Department of Education  
Department of Environmental  
Department of Health  
Division of Housing and Community  
Insurance Department  
Department of Labor (Industrial Board of Appeals)  
Department of Law (Attorney General)  
Liquor Authority  
Department of Public Service  
Department of State

**Performance Measures:**

Making sure that all required state agencies file their notices of appearances on a quarterly basis.  
Verifying that all lobbying activity has been recorded correctly.

Notices of Appearance forms reviewed in 2006	4000
Notices of Appearance forms reviewed in 2007	7000
Notices of Appearance forms reviewed in 2008 (as of 8/1/08)	4300
Official Inquiry Letters sent out in 2006	3
Official Inquiry Letters sent out in 2007	65
Official Inquiry Letters sent out in 2008 (as of 8/1/08)	3

N.Y.S. Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Training and Educational Services: Online Seminars

**Mandate:**

Executive Law §94.16(a) and (b) specifically call for the Commission to "*promulgate rules*" and "*conduct training programs*" respectively. In the Lobbying Act §1-q the Commission "*shall promulgate all rules or regulations and any procedures, forms, or instructions necessary to implement the provisions.*" The unit also provides additional support to Communications / Public Information and Financial Disclosure by providing additional information to New York State employees.

**Mandated Funding Level:**

None

**Brief Description/History/Background:**

Training and Educational Services has two distinctive online training courses to better serve their customers. The former Ethics Commission created an online training program hosted by the Governor's Office of Employee Relations (GOER) as a way of providing training to a wider audience (because GOER was unable to assist in providing monetary and logistical support). Although the program is useful, it severely limits CPI's ability to control and update content. Lobbying created an internal online program that would allow their lobbyists and clients to avoid penalties and late fees by taking a remediation course online. Both programs assist CPI in achieving training goals and will eventually be combined and hosted in-house for flexibility and content control.

**Issues:**

The Training and Educational Services unit has invested in online training software as a way of cutting down on travel costs, staff hours monitoring curricula content, and repetition of services. It would also allow CPI to expand its training to a larger audience with dwindling resources. Although it may appear be a significant departure from traditional training, (because we create the courses inhouse) it is a direct supplement to CPI's primary mission. This program will also provide better performance measures tools than TES currently has.

**Population Served:**

Over 250,000 New York State employees, 6,152 Lobbyists, 3,895 Clients, 54 (Retained) Public Corporations, and the employees of the State University of New York, City University of New York, New York Metropolitan Transit Authority, Roosevelt Island Operating Corporations, Not-for-Profits, and miscellaneous other members of the public.

**Performance Measures:**

TES is somewhat limited in what we can track in regard to online material; however, as we begin to modify our operation we are building performance measures, tracking benchmarks, and direct goals into our online program. We expect to begin tracking who attends online courses in the near future. Success of this area, we anticipate will "off set" and relieve the pressure of the high demand on instructor-led training services we provide.

N.Y.S. Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Training and Educational Services: Instructor-led Seminars

**Mandate:**

Executive Law §94.16(a) and (b) specifically call for the Commission to "*promulgate rules*" and "*conduct training programs*" respectively. In the Lobbying Act §1-q the Commission "*shall promulgate all rules or regulations and any procedures, forms, or instructions necessary to implement the provisions.*" The unit also provides additional support to Communications / Public Information and Financial Disclosure by providing additional information to New York State employees.

**Mandated Funding Level:**

None

**Brief Description/History/Background:**

Training and Educational Services was created from the Ethics Commission's "Training" and the Lobby Commission's "Education" units. Both Commissions provided educational services to their respective customers but in very different manners. The Ethics training unit has lineage in the Public Information office which originally provided the training, along with legal staff, and the Executive Director's office. Educational services at Lobbying was designed to assist Lobbyists, Clients, and Public Corporations become compliant with their statute. When Lobbying was independent, "education" was responsible for communications, publicity, and public engagements, making them more of a "help desk" and one-on-one consultive operation.

**Issues:**

The Training and Educational Services unit has instituted several procedures in an attempt to combine the two units with a more efficient utilization of staff and focus operations on preventative measures. Cost savings have already been identified, instituted, and in some cases a more effective operation has already been realized. TES expects to continuously improve.

**Population Served:**

Over 250,000 New York State employees, 6,152 Lobbyists, 3,895 Clients, 54 (Retained) Public Corporations, and the employees of the State University of New York, City University of New York, New York Metropolitan Transit Authority, Roosevelt Island Operating Corporations, Not-for-Profits, and miscellaneous other members of the public.

**Performance Measures:**

TES tracks the number of individuals attending our training, the number of State government entities that are represented in those sessions, the amount of written materials and publications that are dispersed, as well as the number of lobbyists and their clients that are represented at our educational events. We're attempting to increase accuracy of these benchmark activities. In FY06-07 we instructed 5,222 and, in FY07-08, we instructed 5,713 individuals in traditional classroom training.

N.Y.S. Commission on Public Integrity  
**PROGRAM INFORMATION SHEET**

**Program:** Training and Educational Services: Publications

**Mandate:**

Executive Law §94.16(a) and (b) specifically call for the Commission to "*promulgate rules*" and "*conduct training programs*" respectively. In the Lobbying Act §1-q the Commission "*shall promulgate all rules or regulations and any procedures, forms, or instructions necessary to implement the provisions.*" The unit also provides additional support to Communications / Public Information and Financial Disclosure by providing additional information to New York State employees.

**Mandated Funding Level:**

None

**Brief Description/History/Background:**

Training and Educational Services, in order to provide the best level of training available, needs to create and publish both electronic and traditional bound booklets, course handouts, and other educational material. This is absolutely necessary for our training to live up to our mandate to "*promulgate,*" provide "*instructions,*" and "*conduct training programs.*" Although, in the future, we're already committed to creating less paper, more electronic, and easily printed handouts, the mandate is still there.

**Issues:**

The Training and Educational Services unit has begun to invest more time and effort in reducing costs by producing more materials in-house and limiting printing to absolute necessity. When possible, agencies that request training will be asked to absorb some of the cost of course handouts and materials.

**Population Served:**

Over 250,000 New York State employees, 6,152 Lobbyists, 3,895 Clients, 54 (Retained) Public Corporations, and the employees of the State University of New York, City University of New York, New York Metropolitan Transit Authority, Roosevelt Island Operating Corporations, Not-for-Profits, and miscellaneous other members of the public.

**Performance Measures:**

TES is committed to creating as many electronic course materials and booklets as possible; to increase ease of use, such as searching and location of material; and decrease publishing or printing costs. The most recent printing of Public Officers Law booklets was received in May and we have dispensed over 61,525 copies. We have not been able to accurately track our countless other training and informational publications.