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February 22, 2017

The Honorable Alex Padilla  
Secretary of State  
1500 11th Street  
Sacramento, CA 95814  
via email to [PRDCARS@sos.ca.gov](mailto:PRDCARS@sos.ca.gov)

**RE: Cal-Access Replacement System**

Dear Secretary Padilla,

On behalf of California Common Cause and our members, we write in response to your request for public feedback on the Cal-Access replacement system. Thank you for your leadership on modernizing Cal-Access to improve campaign finance and lobbying filing and disclosure.

California Common Cause has been a longtime advocate for using the Internet to increase political transparency. We supported Assembly Bill 3575 (Speier) of 1994 and Senate Bill 49 (Karnette) of 1997, which created Cal-Access. Most recently, we were a co-convenor of the Political Reform and Modernization (PRAM) working group, which developed the concept for Senate Bill 1349 (Hertzberg) of 2016, and a sponsor of the legislation, which directs the Secretary of State to modernize Cal-Access.

In our view, the foremost goal for a Cal-Access replacement system must be to increase transparency for voters. A successful replacement system will facilitate access and understanding by members of the public and their intermediaries, such as journalists and watchdogs. The system's interface and navigation should be more intuitive to assist voters in finding relevant information, and provide easily-understandable summaries, such as charts and graphs.

To deliver the standard of disclosure that Californians have come to expect, the replacement system must be data-driven, rather than form-based. To be responsive to future legislative or regulatory changes, the replacement system must be flexible, adaptable, and extensible. Our policy choices should no longer be held hostage by outdated technology.

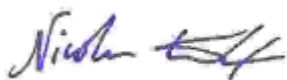
The Cal-Access replacement system should truly be a system for all of California. The time has come to end information silos based on a filing method designed in 1974, and instead move toward a comprehensive stateside campaign finance disclosure platform. Our recent research found that 68% of California cities do not provide online access to campaign finance data filed there. Voters deserve better.

To address this shortcoming, we suggest that your office design the replacement system with the capability to accept data in the Cal-Access record format from local filing offices and develop a memorandum of agreement with filing offices to contribute data to Cal-Access. In your report to the Legislature later this year, we encourage you to recommend an approach that would provide one-stop disclosure through Cal-Access of all campaign finance data reported under the Political Reform Act.

We look forward to a replacement system that is more user-friendly for campaign finance and lobbyist filers. Improved filer interfaces can facilitate compliance, eliminate computation errors, and collect cleaner data that provides more meaningful disclosure.

Please find attached more detailed, non-exhaustive suggestions for the replacement system. We would welcome the opportunity to continue to provide feedback and assistance to your office throughout this project. Please feel free to contact me at [nheidorn@commoncause.org](mailto:nheidorn@commoncause.org) or (916) 520-4070 should you have any questions. Thank you for your consideration.

Sincerely,



Nicolas Heidorn  
Policy and Legislative Counsel  
California Common Cause



Gavin R. Baker  
Open Government Program Manager  
California Common Cause

cc: The Honorable Jodi Remke, Chair, Fair Political Practices Commission  
The Honorable Evan Low, Chair, Assembly Committee on Elections and Redistricting  
The Honorable Henry Stern, Chair, Senate Committee on Elections and Constitutional Amendments  
The Honorable Robert Hertzberg, Senator  
The Honorable Kevin Mullin, Assemblymember

## **Cal-Access Replacement System Suggestions for User-Friendly Features**

### **System Design**

1. Data-driven, rather than form-based, concept
2. Capable of adaptation and extension to accommodate future policy changes
3. Designed and maintained in consultation with stakeholders to meet user expectations

### **Disclosure**

4. Provide summaries and graphical displays of data, such as a list of the top donors to a candidate or the highest-spending lobbyist employers
5. Display all-time aggregate information from a filer, not solely by filing period
6. Use hyperlinks to facilitate navigation, such as linking from a committee named in a campaign finance or lobbying filing to the named committee's filings
7. Offer subscription options (*e.g.*, RSS or email) to be notified of future statements by a filer
8. Offer export of all data from a filer (*e.g.*, in Excel or CSV format)
9. Display text following standard capitalization rules, rather than in all capital letters
10. Consider moving the system to shorter, more intuitive URLs (*e.g.*, [campaigns.ca.gov/\[filer ID #\]](#) and [lobbying.ca.gov/\[filer ID #\]](#))

### **Campaign Finance Disclosure**

11. Offer a ZIP code search or geolocation to find candidates and committees in a particular area (*e.g.*, the elections that will appear on the voter's ballot)
12. Provide search and browse options for candidate filings by office, including judicial candidates (who file electronically with the Secretary of State but are not categorized in the current system)
13. Ingest data in the Cal-Access record format from local filing offices for display through Cal-Access
14. Recommend an approach to provide one-stop disclosure through the new system of all campaign finance data reported under the Political Reform Act

### **Lobbying Disclosure**

15. Provide search and browse options to find all lobbying activity on a particular bill, regulation, or agency (see #36)
16. Link from named bills to the bill's information on LegInfo

### **Filing (Cal-Online) and Record Format**

17. Provide an intuitive step-by-step filing experience, beginning with questions about the filer's activity in the reporting period, rather than the choice of which form to file
18. Automatically suggest and fill the dates for a statement's filing period
19. Save basic information about the filer and pre-populate future filings
20. Customize the filing experience by showing only fields that are relevant to the specific filer type
21. Integrate form instructions into the online filing system and link to relevant manual sections
22. Automatically sum total amounts (*e.g.*, year-to-date totals)
23. Flag potential data entry errors or violations for the user's review
24. Add an optional comment field to each entry for filer remarks
25. Email reminders of upcoming filing deadlines to registered filers

26. Automatically save entered data without the filer needing to click a button
27. Consider providing one-stop filer services (*e.g.*, messaging, fee payment) through Cal-Online

### Campaign Finance Filing

28. Email correspondence from the Secretary of State to the filer and save in online message center
29. Allow users to save a draft statement while working on another statement (*e.g.*, save a draft of a Form 460, begin work on a Form 497, then return to the draft Form 460)
30. Save entities (*e.g.* contributors, vendors, etc.) from previous filings and auto-fill future entries
31. Confirm the user's intention via a dialog box before deleting entered information or cancelling a draft statement
32. Save a copy of deleted draft statements (*e.g.*, "Trash") so users can recover if erroneously deleted
33. Ensure navigation buttons are placed in consistent locations (*e.g.*, don't sometimes put the "Cancel" button where the "Back" button usually is)
34. Carry forward all data entered on a draft statement, including zeroes
35. Explore the feasibility of importing data from common accounting software such as Excel or QuickBooks (*e.g.*, by providing a template file and offering an upload option)
36. Design to be compatible with potential future fully-electronic filing, if the Political Reform Act is amended to eliminate paper filing requirements (*e.g.*, allow filing Form 410 online) (see #2)

### Lobbying Filing

37. Create data fields for bills, regulations, and agencies lobbied, and standardize entries to facilitate searches (see #14)
38. Add data fields for subcategories of other payments to influence
39. Automatically save when the user moves to the next page
40. Offer an option to prepopulate with information from the previous filing