

AGENCY STRATEGIC PLAN

FISCAL YEARS 2027 – 2031

BY

TEXAS ETHICS COMMISSION

BOARD MEMBERS	TERM	HOMETOWN
CHRIS FLOOD, CHAIR	2017-2019	HOUSTON
PATRICK W. MIZELL, VICE CHAIR	2018-2021	HOUSTON
RANDALL H. ERBEN	2017-2025	AUSTIN
RICHARD S. SCHMIDT	2018-2021	CORPUS CHRISTI
JOSEPH O. SLOVACEK	2018-2021	HOUSTON
SEAN GORMAN	2024-2027	HOUSTON
GEANIE MORRISON	2025-2027	VICTORIA
MARK STRAMA	2024-2027	AUSTIN

SUBMITTED JUNE 2026

SIGNED: _____ */s/ JAMES TINLEY*
James Tinley
Executive Director

APPROVED: _____ */s/Chris Flood*
Chris Flood
Chair

Table of Contents

Agency Mission	5
Agency Overview	5
Agency GOALS AND ACTION PLAN.....	7
Agency Operational Goal No. 1: Public Disclosure of Reports	7
Agency Operational Goal No. 2: Promote Compliance.....	8
Agency Operational Goal No. 3: Interpretation and Rulemaking	9
Agency Operational Goal No. 4: Enforcement.....	10
Agency Operational Goal No. 5: Foster a Culture of High Performance	11
REDUNDANCIES AND IMPEDIMENTS	13
Redundancies and Impediments No. 1: FTE cap.....	13
Redundancies and Impediments No. 2: Competitive Salaries	13
Redundancies and Impediments No. 3: Collection of Civil Penalties	14
Redundancies and Impediments No. 4: Outdated Laws	15
Redundancies and Impediments No. 5: Asymmetric enforceability of complaint confidentiality	16
Redundancies and Impediments No. 6: Confusing Annual Threshold Adjustments.....	16
Redundancies and Impediments No. 7: No Enforcement of Conflict of Interest Disclosure form (Form1295)	17
Redundancies and Impediments No. 8: Fraudulent PAC Practices	18
Redundancies and Impediments No. 9: Single Vendor for Electronic Filing System.....	19
SUPPLEMENTAL SCHEDULES	20
Schedule A: Budget Structure.....	20
GOAL: Administer Ethics Laws. Fulfill the agency’s constitutional and statutory directive to administer and enforce the state’s campaign finance, lobby, and other related ethics laws.....	20
A.1.1 Strategy I: Disclosure Filing. Serve as the repository for statutorily required information.....	20
A.1.2 Strategy II: Office of the General Counsel. Perform all legal and regulatory functions of the agency.	20
A.1.3 Strategy III: Enforcement. Respond to complaints and enforce applicable statutes.....	21
GOAL: Indirect Administration.....	21
B.1.1 Strategy I: Central Administration.....	21
B.1.2 Strategy II: Information Resources.....	21
Schedule B: Measure Definitions	22
A.1.1 Disclosure Filing	22
Outcome 1: Percent of reports available for public inspection within two days	22
Output 1: KEY. Number of reports logged within two business days of receipt.	22
Output 2: Number of reports received and processed.....	23
Explanatory 1: Number of inquiries for information.....	23
Explanatory 2: Number of lobbyists registered with the Commission.....	24
Explanatory 3: Number of public officials required to file reports with the Commission. ..	25
Explanatory 4: Number of reports due filed electronically.	25
A.1.2 Strategy II: Office of the General Counsel.	26
Outcome 1: KEY. Percent of advisory opinion requests answered with the statutory deadline.	26

Output 1: Number of advisory opinions adopted by the Commission.....	26
Output 2: Number of PIA requests responded to by the Commission.....	27
Output 3: Number of filers referred to the Attorney General for the collection of unpaid fines.....	27
Efficiency 1: KEY. Average time (business days) to answer advisory opinion requests.	28
Explanatory 1: Number of information requests regarding Commission administered laws.....	29
Explanatory 2: Number of advisory opinion requests received.....	29
Explanatory 3: Number of PIA requests received.	30
Explanatory 4. Total amount of unpaid fines referred to the Attorney General for collection.....	30
A.1.3 Strategy III: Enforcement.....	31
Outcome 1: % of sworn complaints processed within five business days after filing.....	31
Output 1: KEY. Number of sworn complaints processed.....	32
Output 2: Number of late notices sent to filers.	32
Output Measure: Number of Complaints Closed.....	33
Output Measure: Number of Attempted Complaints Responded to.....	33
Efficiency 1: KEY. Average business days to process sworn complaints.....	34
Efficiency 2: Average time to notify late filer of late report.	34
Efficiency 3: Average time to notify complainants and respondents/Commission Final Disposition.	35
Efficiency Measure: Average Time to Resolve Complaints After Jurisdiction is Accepted	36
Explanatory 1: Percent of filers filing timely reports.	36
Explanatory 2: Number of late penalties received.....	37
Explanatory 3: Percent of complaints dismissed because resolution was not proposed within 120 days.	37
Schedule C: Historically Underutilized Business Plan.....	39
Schedule F: Workforce Plan.....	41
Agency Overview.....	41
Agency Mission.....	41
Business Functions.....	41
Anticipated Changes to the Mission, Strategies and Goals over the Next Five Years.....	41
Additional Considerations.....	42
Challenges to Providing Competitive Salaries.....	42
Current Workforce Profile (Supply Analysis).....	42
Critical Workforce Competencies.....	42
Workforce Demographics.....	42
Employee Ethnicity by EEO Job Category.....	45
Agency Turnover.....	45
Turnover by Length of Service.....	47
Retirement Eligibility and Employee Attrition Rate over the Next Five Years.....	48
Workforce Skills Critical to Agency Mission and Goals.....	48
Future Workforce Profile (Demand Analysis).....	49
Critical Functions Required to Achieve the Strategic Plan.....	49
Expected Workforce Changes.....	49
Future Workforce Skills Needed.....	50

Expert in data analysis and visualization	50
Web design and software programming	50
Attorney and Legal Staff.....	51
Administrative Staff.....	51
Anticipated Increase/Decrease in the Number of Employees Needed	51
Strategy Development.....	51
Specific Goals to Address Workforce Competency Gap/Surplus	51
Schedule H: Report on Customer Service	53
Introduction.....	53
Inventory of External Customers by Strategy.....	53
Strategy A1.1 Disclosure Filing.....	53
Strategy A1.2 Legal Guidance and Opinions	53
Strategy A1.3 Enforcement.....	54
Strategy B.1.1 Central Administration.....	54
Strategy B.1.2 Information Resources	54
Customer Service Performance Measures and Methodology	55
Analysis of Results	56
Certification of Compliance With CyberSecurity Training	62
Certification of Compliance With Artificial Intelligence Training	63

AGENCY MISSION

The mission of the Texas Ethics Commission (“TEC”) is to promote public confidence in government and protect the integrity of Texas’s electoral process by shining a light on and curbing undue influence in electoral and political activities. To achieve this purpose, the TEC has administrative and enforcement authority over the state’s campaign finance, lobby, and government ethics laws.

The laws placed under the TEC’s jurisdiction reflect a belief that democracy works best when voters can make informed decisions in the political process—decisions based in part on knowing the sources of financial support for candidates and political committees, the identity and activities of those who communicate directly with public officials for the purpose of influencing government action, and the financial interests of state officers and candidates. Public confidence in the political process also depends on the knowledge that participants in Texas elections, state and local officials, and lobbyists follow clear and well-defined rules and face consequences for non-compliance. The TEC strives to foster a culture of high performance to ensure that it accomplishes these objectives efficiently, impartially, and effectively.

AGENCY OVERVIEW

Texas voters approved a constitutional amendment that, with concurrently adopted enabling legislation, created the TEC effective January 1, 1992. The constitutional amendment established an eight-member commission with four members appointed by the Governor, and two each by the Lieutenant Governor and the Speaker of the House. To ensure that the TEC would be bipartisan, the constitution requires appointees to be selected in equal numbers from lists, submitted by Republican and Democratic members of the Texas Senate and Texas House of Representatives. The members of the TEC hold staggered four-year terms and annually elect a presiding officer.

The TEC has both constitutional and statutory duties. Constitutionally, the TEC is authorized to recommend the salary of members of the Legislature and the Lieutenant Governor, subject to approval by the voters, and sets the per diem for members of the Legislature and the Lieutenant Governor. The TEC’s statutory duties, which are partially outlined in Chapter 571 of the Government Code, include the enforcement and administration of Texas’s laws regarding campaign finance and political advertising (Title 15 of the Election Code), lobby activity (Chapter 305 of the Government Code), the personal financial disclosure by state officers and candidates, and the standards of conduct and conflicts of interest of public servants (Chapter 572 of the Government Code), and other related laws regulating the reporting requirements of other state and local officials and entities.

The TEC has 31.8 full-time employees, including an Executive Director and a General Counsel that are appointed by its commissioners. The TEC is divided into five divisions, including:

Disclosure Filing. The Disclosure Filing Division processes and maintains all reports received by the Commission (TEC). In addition, this division provides the public with information about

and copies of disclosure reports filed with the agency, distributes blank disclosure reporting forms upon request, and notifies filers of their obligations and of any late or missing filings. This division administers TEC's directive to receive and make available for public review and inspection required disclosure reports for state officials, candidates, political committees, lobbyists, political parties, party chairs, legislative caucuses, and judicial officers.

Enforcement. The Enforcement Division investigates alleged violations of the law, recommends to the Commission appropriate action to take with respect to apparent violations, and negotiates agreed resolutions with respondents or their counsel. If an enforcement matter is not resolved by agreement, the complaint proceeds to a formal hearing before the Commission where a respondent may present evidence and legal argument. A respondent who wishes to challenge a decision of TEC has the right to file a *de novo* appeal in Travis County District Court. The TEC also automatically assesses statutory penalties to candidates, officials, and lobbyists who fail to file required reports on time. Texas law and TEC's rules provide a legal process for appealing those penalties, and the Enforcement Division is responsible for processing those appeals. Finally, the Enforcement Division also conducts randomized audits of reports filed with TEC, as directed by state law. If any issues are discovered during this process, the Enforcement Division provides guidance to filers for corrective actions or, if necessary, presents the matter to TEC with a request to initiate a proceeding against the non-compliant individual.

Office of the General Counsel. The Office of the General Counsel ("OGC") performs all other legal and regulatory functions of the agency. The OGC's primary responsibility is to provide legal counsel to TEC, including advising commissioners on proposed rules and advisory opinions, the resolution of enforcement matters, and the daily operational matters of the agency. The OGC's other functions include promoting voluntary compliance with the law by providing educational resources and outreach to filers and the general public, assisting the Office of the Attorney General or outside legal counsel in civil actions brought by or against the TEC, serving as the agency's liaison to governmental agencies, the media, law enforcement, and the Legislature, and assuring the TEC's compliance with EEO/AA, ADA, and agency safety and ethics requirements.

Administration. The Administration Division handles the working function of the agency. It provides the primary support for TEC with respect to accounting and budgeting, purchasing, travel, human resources and payroll, secretarial, building and equipment maintenance, risk and safety management, mail services and inventory control. This division has the essential function of working to keep the agency in compliance with the state laws and regulations generally applicable to executive branch agencies.

Computer Services. The Computer Services Division maintains TEC's technology infrastructure, the electronic filing system and database, and the agency's website. This division also provides technical support to filers who are required to file reports electronically with TEC, prepares reports in response to open records requests for data from electronically filed reports, and assists staff with computer applications. In addition, the TEC's Computer Services staff conducts systems analysis and design, information security, information resource policy development, and project management.

AGENCY GOALS AND ACTION PLAN

AGENCY OPERATIONAL GOAL NO. 1: PUBLIC DISCLOSURE OF REPORTS

Inform the public about how political campaigns in Texas are financed, the activities and expenditures of lobbyists, and the financial interests of state officers and candidates.

Specific Action Items for Improving the Public Disclosure of Reports

1. Improve existing procedures for making reports and data available to the public.
2. Improve process for electronically filing campaign finance and lobby reports.
3. Automate redaction of sensitive information that needs to be removed by law before reports are made publicly available.

How the Public Disclosure of Reports Supports Statewide Objectives

1. Accountable to tax and fee payers of Texas.

The agency's web-based disclosure system ensures that the vast quantity of data reported to the TEC is available to the public quickly and in a manner that is easy to sort, search, and comprehend.

2. Efficient such that maximum results are produced with a minimum use of taxpayer funds, including through the elimination of redundant and non-core functions.

The TEC seeks to automate more of the steps that must occur before electronically filed reports are available to the public. The agency minimizes the use of taxpayer funds by making campaign finance and lobby reports available on TEC's website so the public is able to access data without assistance.

3. Effective in successfully fulfilling core functions, measuring success in achieving performance measures, and implementing plans to continuously improve

On average between fiscal years 2021 and 2025, the TEC received more than 97,745 campaign finance reports, lobby reports, and other disclosure documents from more than 8,559 filers. The agency successfully makes 99.96 percent of these reports available to the public within two working days and continuously seeks to improve the user experience for both filers and the public.

4. Attentive to providing excellent customer service.

During each fiscal year the TEC responds to approximately 39,000 requests for technical assistance and over 500 requests made under the Public Information Act.

5. Transparent such that agency actions can be understood by any Texan.

The TEC seeks to promote public confidence in government by providing transparency into the political process.

AGENCY OPERATIONAL GOAL NO. 2: PROMOTE COMPLIANCE

Promote voluntary compliance with the law through educational outreach.

Specific Action Items to Promote Compliance

1. Continue to provide on-demand legal assistance to filers.
2. Improve existing plain-language legal guides and hold instructional seminars.
3. Conduct randomized audits and provide guidance to filers when issues are discovered.
4. Expand educational outreach to state employees.

How Promoting Compliance Supports Statewide Objectives

1. Accountable to tax and fee payers of Texas.

The TEC will continue to devote significant resources to educating filers and the public by operating a legal help-line, publishing plain-language legal guides, and holding interactive instructional webinars.

2. Efficient such that maximum results are produced with a minimum use of taxpayer funds, including through the elimination of redundant and non-core functions.

Successful voluntary compliance is the most efficient way to deliver on the agency's mission. The TEC has also adopted policies to leverage existing data and automated processes to identify issues requiring stepped up educational outreach, or enforcement action, if necessary. The TEC has also conducted a series of webinars to provide interactive trainings for the public with a broad reach with minimal agency expense and free to the public.

3. Effective in successfully fulfilling core functions, measuring success in achieving performance measures, and implementing plans to continuously improve.

TEC has received and responded to approximately 10,000 requests for legal guidance each year, either by phone or email.

4. Attentive to providing excellent customer service.

Individuals who call or email TEC have access to expert guidance in a complex area of laws not readily available from other sources. TEC responds to virtually all requests within 48 business hours, putting filers directly in touch with knowledgeable TEC attorneys and legal staff.

The TEC also publishes many plain-language guides that describe the requirements of the laws it administers and enforces, and posts all advisory opinions and agency regulations on the TEC's public website. TEC holds instructional webinars for filers and potential filers and makes training videos available on its website.

The TEC has improved cross-divisional coordination to ensure consistent and timely information is provided to customers and the general public.

5. Transparent such that agency actions can be understood by any Texan.

The TEC strives to make the legal requirements of the laws it administers and enforces clear and understandable to all Texans. It provides on-demand assistance, plain-language guides, and educational webinars to facilitate that transparency.

AGENCY OPERATIONAL GOAL NO. 3: INTERPRETATION AND RULEMAKING

Issue timely advisory opinions and promulgate clear rules regarding the application of laws administered and enforced by TEC, and provide clarity, where needed, through rulemaking.

Specific Action Items to Interpret the Law and Exercise Rulemaking Authority

1. Give timely and well-written advice to commissioners on proposed rules and advisory opinions to clarify the requirements of the laws administered and enforced by the TEC.
2. Defend the laws administered and enforced by the TEC against legal challenges.
3. Continue review of existing rules focusing on clarifying vague or confusing rules and repealing redundant or unnecessary rules.

How Interpretation and Rulemaking Supports Statewide Objectives

1. Accountable to tax and fee payers of Texas.

In administering and interpreting the laws under its jurisdiction, TEC remains mindful of the First Amendment's guarantees of freedom of speech, association, and to petition the government, and the practical implication of its actions on the political process. TEC legal staff will continue to provide guidance to its commissioners on the application of those laws, and work with outside counsel to defend them.

2. Efficient such that maximum results are produced with a minimum use of taxpayer funds, including through the elimination of redundant and non-core functions.

The TEC completed a comprehensive review of existed rules, focusing on repealing redundant and unnecessary rules. The TEC continues to revise its rules for simplicity and clarity, and promptly adopt new rules in response to Legislative action, judicial decisions, or other changes in the law and may adopt rules as necessary in response to public comments.

3. Effective in successfully fulfilling core functions, measuring success in achieving performance measures, and implementing plans to continuously improve.

It is essential to have a clear and well-defined set of rules for complying with the laws administered and enforced by the agency. Over the past several years the TEC has steadily increased the number of advisory opinions issued.

4. Attentive to providing excellent customer service.

In order to encourage voluntary compliance, state law requires the TEC to issue legally-binding advisory opinions in response to qualified requests that address the application of laws under the agency’s jurisdiction.

5. Transparent such that agency actions can be understood by any Texan.

The TEC considers public comments and publicly deliberates the adoption of final regulations and advisory opinions. The TEC publishes drafts of proposed opinions for public comment before adoption. The TEC has also adopted rules to proactively encourage participation from people who have specialized knowledge on the subject of an opinion or are likely to be affected by an advisory opinion.

AGENCY OPERATIONAL GOAL NO. 4: ENFORCEMENT

Fair, effective, and timely enforcement of the laws administered and enforced by the TEC.

Specific Action Items to Enforce the Law

1. Continue to process sworn complaints accurately, efficiently, and impartially.
2. Improve processes for issuing statutory penalties and adjudicating appeals.
3. Defend TEC’s enforcement determinations in court.
4. Utilize automation to proactively review TEC and local filings to improve and compliance.

How Enforcement Supports Statewide Objectives

1. Accountable to the tax and fee payers of Texas.

The TEC has jurisdiction over the civil enforcement of the State’s campaign finance, lobby, and other related government ethics laws. The TEC is accountable to the taxpayers of Texas by enforcing duly enacted State law.

2. Efficient such that maximum results are produced with minimum use of taxpayer funds, including through the elimination of redundant and non-core functions.

In fiscal year 2025, the TEC recovered \$460,967 in penalties. The TEC plans to improve its collection processes by, for example, enabling online payment and sending immediate electronic notifications to filers of missed deadlines.

3. Effective in successfully fulfilling core functions, measuring success in achieving performance measures, and implementing plans to continuously improve.

Public confidence in the political process depends on the knowledge that those who violate ethics laws will be held accountable. The TEC is finding ways to process complaints more efficiently, even as the volume of new complaints increases. The TEC received an average of 313.5 complaints in fiscal years 2020-2023. This number increased by 279 to 592 for FY 2024 & 2025, and based on filings as of 4/29/26, the TEC expects to receive roughly 725 total complaints in FY 2026 – a 22% increase over the FY 2024-2025 total and a 131% increase over the FY 2020-2023.

4. Attentive to providing excellent customer service.

The TEC is committed to resolving matters expeditiously while providing due process to all parties. The agency notifies each filer of upcoming deadlines and late filings, and provides the opportunity for filers to appeal penalties that are assessed for late filings.

5. Transparent such that agency actions can be understood by any Texan.

State law requires the TEC to maintain the confidentiality of the complaint process. However, many complaint decisions are public and are posted online, and the TEC maintains an online list of delinquent filers and unpaid penalties. The decisions provide valuable information to the public about positions taken by TEC on various issues and are informative not only to filers facing sworn complaint proceedings, but also to filers seeking compliance with the law.

AGENCY OPERATIONAL GOAL NO. 5: FOSTER A CULTURE OF HIGH PERFORMANCE

The TEC’s greatest resource is its employees. Organizational performance is also significantly improved when internal management processes are efficient and effective. TEC will take steps outlined in this plan to ensure that the agency’s working environment promotes and supports the best efforts of its staff.

Specific Action Items to Achieve a Culture of High Performance

1. Recruit and maintain a high-performing workforce.
2. Implement strategic goals on time and within budget.
3. Improve the agency’s contracting practices by continuing to refine its updated contracting policies.

How a Culture of High performance Supports Statewide Objectives

1. Accountable to tax and fee payers of Texas.

TEC delivers better results to the taxpayers of Texas when it has a high-performing and knowledgeable workforce. Being able to recruit and maintain those employees is essential to accomplishing the agency’s mission.

2. Efficient such that maximum results are produced with a minimum use of taxpayer funds, including through the elimination of redundant and non-core functions.

The TEC currently operates with only 31.4 full-time employees. It has exclusive jurisdiction over the civil enforcement of laws that apply to both state and local candidates, officers, political committees, and lobbyists. It maintains an online filing system with over 49,595 active users, and it notifies each filer of upcoming deadlines and delinquent reports. And it provides on-demand legal assistance in response to tens of thousands of requests every year.

The TEC works to automate cumbersome manual functions through improvements to its electronic filing system. The TEC is also exploring adopting “help desk”

software to better track and coordinate calls for help from the public among its divisions.

3. Effective in successfully fulfilling core functions, measuring success in achieving performance measures, and implementing plans to continuously improve.

Please see the following below: (1) Schedule A (Performance Measures detailing how agency consistently meets goals); (2) Schedule C (Agency use of Historically Underutilized Businesses exceeds goals); and (3) Schedule F (Workforce Plan demonstrating the understanding of future needs).

4. Attentive to providing excellent customer service.

Customer service is a priority for every division of the TEC. The TEC works hard to ensure all calls or emails for the public are answered within 48 business hours with useful and substantive information. TEC's report on customer service is attached as Schedule H. The TEC will continue to apply and refine its policies to ensure requests for information or help from the agency will be met with timely, accurate, and consistent information.

But providing excellent customer service is more than responding to calls from the general public. It requires excellence from each employee across the TEC's five divisions. Excellent customer service requires skilled enforcement attorneys who recommend fair and just resolutions to sworn complaints, skilled OGC attorneys who draft clear and cogent advisory opinions and rules, and excellent programmers and IT staff who can keep pace with evolving technology to meet cybersecurity threats and deliver a use-friendly filing system. The TEC is committed to holding its employees to high standards and seeking to retain its excellent employees.

5. Transparent such that agency actions can be understood by any Texan.

The TEC strives to make its hiring and contracting processes transparent. The TEC's plan for its use of HUBs/VetHUBs in purchasing contracts is attached as Schedule C, and its agency workforce plan is attached as Schedule F. The TEC has also publicly proposed and adopted new contracting rules and policies and overhauled its sworn complaint rules to ensure an efficient and fair process. As the TEC continues to refine its internal policies, it presents the revised policies to commissioners at public meetings and adds the policies to its website.

REDUNDANCIES AND IMPEDIMENTS

<u>REDUNDANCIES AND IMPEDIMENTS NO. 1: FTE CAP</u>	
Service, statute, rule or regulation	GAA, HB 1, 89 th Legislature.
Describe why the service, statute, rule, or regulation is resulting in inefficient or ineffective agency operations	The 88 th Legislature cut the TEC’s employee cap from 34.4 to 28.4. The 89 th Legislature added back three FTEs, providing two attorneys and one project manager for IT projects. However, additional resources are needed to meet the increasing workload and to keep pace with changing technology. The TEC’s small IT staff handles the technology needs of TEC staff while also working to maintain the TEC’s electronic filing system with its vendor. IT staff also plan and implement enhancements to the filing system. More staff resources are needed for the effective management of the TEC’s technology contracts and in-house software development projects.
Provide agency recommendation for modification or elimination	Provide authority and funding for a chief technology officer and an additional computer programmer.
Describe the estimated cost savings or other benefit associated with recommended change	More robust staffing for the Computer Services Division will ensure that existing contracts are effectively managed and future contracts are better planned and scoped appropriately. Most of the improvements are designed to automate manual processes that will improve the user experience and reduce staff time needed for the daily operation of the filing system.

<u>REDUNDANCIES AND IMPEDIMENTS NO. 2: COMPETITIVE SALARIES</u>	
Service, statute, rule or regulation	GAA, HB 1, 89 th Legislature.
Describe why the service, statute, rule, or regulation is resulting in inefficient or ineffective agency operations	During the 89 th session, TEC requested salary adjustments for the exempt positions of Executive Director and General Counsel in order to make those salaries more competitive. Not only do those positions need to be adjusted, but across the board salary increases are needed to attract and retain excellent employees and achieve competitiveness with other state agencies.
Provide agency recommendation for	Provide increased funding for current FTEs.

modification or elimination	
Describe the estimated cost savings or other benefit associated with recommended change	Experienced staff are key in order to provide customer service and to adhere to statutory timelines. Increasing funding for current positions will help to reduce turnover and maintain historical knowledge.

REDUNDANCIES AND IMPEDIMENTS NO. 3: COLLECTION OF CIVIL PENALTIES

Service, statute, rule or regulation	Govt Code § 2107.003.
Describe why the service, statute, rule, or regulation is resulting in inefficient or ineffective agency operations	TEC refers its unpaid penalties to the Office of the Attorney General for collection. In Sept 2025, the OAG adjusted their thresholds and no longer will make any effort to collect fines under \$15,000 for late filings (up from \$1,000 to accept a collections referral and \$2,500 to file suit) or under \$5000 for sworn complaints (up from \$1000). This immediately resulted in nearly 240 referrals being sent back to TEC. The OAG’s new policy also allows a filer to send 30 late reports before there is a threat of a lawsuit to incentivize them to pay. While TEC has authority to enter into outside counsel contracts, it appears the authority to contract with collections firms must be approved by the OAG and even if approved, the statute does not allow the firms to file suit to collect the fines. Those contracted firms would only be allowed to send additional letters, but not do compel payment. Additionally, 1 TAC 59.2(c) describes the use of in-house attorneys to handle collections and also must be approved by the OAG.
Provide agency recommendation for modification or elimination	Provide clear authority for TEC to file suit to collect delinquent fines using its own staff or to contract with firms to file lawsuits to collect. The Legislature could also consider adding non-monetary consequences for failing to pay a TEC fine.
Describe the estimated cost savings or other benefit associated with recommended change	With the change in the referral tolerance, TEC no longer has “teeth” to enforce delinquent filers to pay their penalties. This causes a loss in potential revenue to the state in General Revenue, lets filers know exactly how many times they can file a late report before any resulting fine will be pursued, and causes a concern where filers with fines above the threshold argue that they are being targeted because TEC is unable to enforce all of the fines equally.

REDUNDANCIES AND IMPEDIMENTS NO. 4: OUTDATED LAWS

<p>Service, statute, rule or regulation</p>	<p>Title 15, Election Code; Chapters 571, 572, and 305, Government Code.</p>
<p>Describe why the service, statute, rule, or regulation is resulting in inefficient or ineffective agency operations</p>	<p>Many of the laws under the TEC’s enforcement jurisdiction have not been revised in over 50 years. This results not only in references to outdated technology like diskettes, but also a set of laws that fails to clearly reach modern issues, such as robocalls, artificial intelligence, and fraudulent political committee practices.</p>
<p>Provide agency recommendation for modification or elimination</p>	<p>The Election Code’s definition of “political advertising” was last amended in 2003 to include communications that appear “on an Internet website.” Act of June 2, 2003, 78th Leg., R.S., ch. 249, § 2.23 (codified as Tex. Elec. Code § 251.001). Since that time, there have been several significant technological changes including, for example, the ubiquitous use of the internet by traditional print and television news outlets, the growth of email and text messaging, social media applications, and most recently, the development of artificial intelligence and “deep fake” technology that enables the digital alteration of a person’s identity or words. While prohibiting deep fake videos was added to the section regarding the true source of communication in 2019, (codified as Tex. Elec. Code § 255.004), the Legislature could consider updating the Election Code’s definition and regulation of political advertising to address new technologies and developments in caselaw throughout all relevant statutes.</p> <p>Specific conflicts in statute include two versions of Govt Code § 572.032(a-1) being codified simultaneously (regarding redaction of certain information disclosed in personal financial disclosures) and Section 255.008 of the Election Code purporting to require a judicial candidate to indicate on political advertising whether the candidate is in compliance with spending limits that no longer exist due to legislative change.</p> <p>Election Code § 254.036 could be updated to modernize the law and delete references to outdated technology like diskettes and unnecessary requirements, like filing in black ink and not blue.</p> <p>Allow for notice to be provided by email when an email address is provided. Election Code 254.042(a), and Govt Code 305.033(a), 571.032, 572.030 and 572.033(a) still refer to traditional, registered or certified mail.</p>
<p>Describe the estimated cost savings or other</p>	<p>Modernization of the state’s political ethics laws would reduce the TEC’s operational costs and improve the TEC’s ability to</p>

benefit associated with recommended change	accomplish its statutory mission of promoting public confidence in government.
--	--

<u>REDUNDANCIES AND IMPEDIMENTS NO. 5: ASYMMETRIC ENFORCEABILITY OF COMPLAINT CONFIDENTIALITY</u>	
Service, statute, rule or regulation	Tex. Gov't Code § 571.140.
Describe why the service, statute, rule, or regulation is resulting in inefficient or ineffective agency operations	<p>State law prohibits the disclosure of sworn complaint proceedings and even most resolutions, including dismissals. However, in practice this law <i>only</i> applies to the TEC and its staff. Complainants can, and often do, publicize the complaints they file, which undermines the law's original intent to prevent the weaponization of the TEC's enforcement process.</p> <p>In addition, Govt Code 571.140 prohibits TEC staff from disclosing information regarding a sworn complaint except in certain limited circumstances. Occasionally, criminal law enforcement authorities will request information related to a criminal investigation and it is unclear if TEC is allowed to respond to those requests.</p>
Provide agency recommendation for modification or elimination	The Legislature could revisit the confidentiality laws to increase transparency into the TEC's enforcement proceedings while better protecting respondents against the publicization of baseless allegations.
Describe the estimated cost savings or other benefit associated with recommended change	More transparency may increase public confidence in both the TEC's work and in the candidates and officials subject to the TEC's jurisdiction.

<u>REDUNDANCIES AND IMPEDIMENTS NO. 6: CONFUSING ANNUAL THRESHOLD ADJUSTMENTS</u>	
Service, statute, rule or regulation	Tex. Gov't Code § 571.064(b).
Describe why the service, statute, rule, or regulation is resulting in inefficient or ineffective agency operations	<p>The TEC's enabling legislation requires the agency to annually adjust each reporting threshold "upward to the nearest multiple of \$10" in accordance with inflation as measured by the United States Department of Labor.</p> <p>The requirement to annually adjust reporting thresholds—and the formula the TEC is required to use—results in a confusing and constantly-changing legal regime that is hard to remember and may lead to unintentional violations from well-intentioned filers.</p>

	<p>For example, the original statutory thresholds for providing payee information and for reporting proceeds from the sale of a political asset were both \$100. However, because these laws were enacted at different times, the adjusted thresholds in 2026 were \$230 and \$140, respectively. On personal financial statements, filers were originally required to report the identity of the source of any gift over \$250, but the 2026 adjusted threshold is \$570.</p> <p>To comply with the current law, the TEC must calculate and adopt a long and complicated chart of adjusted thresholds each year. And to comply with the law, filers must constantly consult that chart, knowing that the details of every reporting requirement may change each year.</p>
Provide agency recommendation for modification or elimination	<p>Repeal Tex. Gov't Code § 571.064(b) and revert all reporting thresholds to their original statutory amounts.</p> <p>Alternatively, repeal Tex. Gov't Code § 571.064(b) and set new statutory thresholds that provide filers with clarity, consistency, and permanence.</p>
Describe the estimated cost savings or other benefit associated with recommended change	<p>If Tex. Gov't Code § 571.064(b) is repealed, TEC staff would no longer spend time calculating new thresholds, preparing rule amendments, and updating the filing software. It may also reduce the number of sworn complaints processed by TEC enforcement staff concerning <i>de minimis</i> reporting errors.</p>

<u>REDUNDANCIES AND IMPEDIMENTS NO. 7: NO ENFORCEMENT OF CONFLICT OF INTEREST DISCLOSURE FORM (FORM 1295)</u>	
Service, statute, rule or regulation	Tex. Gov't Code § 2252.908.
Describe why the service, statute, rule, or regulation is resulting in inefficient or ineffective agency operations	<p>State law requires businesses seeking valuable government contracts to file with the TEC a disclosure identifying the individuals who are financially interested in the business, such as directors, officers, and shareholders. Administering this law uses significant TEC resources, and there appears to be significant noncompliance; however, there is no enforcement mechanism.</p> <p>In 2015, the Texas Legislature adopted House Bill 1295, which added Section 2252.908 of the Government Code. The law states that a governmental entity or state agency may not enter into certain contracts with a business entity unless the business entity submits a disclosure of interested parties.</p> <p>The TEC was required to adopt rules necessary to implement that law, prescribe the form ("Form 1295"), and modify its filing system to accept Form 1295 filings. The TEC began accepting the</p>

	<p>filings required by HB1295 in 2016, and receives an average of over 130,000 each year, more than any other type of filing.</p> <p>Approximately 50% of Form 1295 filings failed to disclose any interested parties. However, neither the TEC nor any other agency has the authority to enforce the law.</p>
Provide agency recommendation for modification or elimination	The Legislature could consider whether to include Section 2252.908 of the Government Code within the TEC’s enforcement jurisdiction. Alternatively, the Legislature could consider private rights of action to enforce the law.
Describe the estimated cost savings or other benefit associated with recommended change	Ethics disclosure laws are meant to promote public confidence in government, but if there are no consequences for widespread noncompliance, they can have the opposite effect. Implementing and administering HB1295 has used significant TEC resources and continues to use resources by posting them on the TEC website. Without authority to address noncompliance, those resources will continue to be wasted.

REDUNDANCIES AND IMPEDIMENTS NO. 8: FRAUDULENT PAC PRACTICES

Service, statute, rule or regulation	Election Code 253.035.
Describe why the service, statute, rule, or regulation is resulting in inefficient or ineffective agency operations	<p>An increasing number of political committees – sometimes called “scam PACs” – solicit contributions with the promise of supporting candidates, but then disclose minimal or no candidate support activities. Instead, their fundraising predominately funds personal compensation for the committees’ organizers.</p> <p>TEC has no jurisdiction to address fraudulent solicitation of contributions or prevent the conversion of committee funds to personal use. While candidates are prohibited from converting political contributions to their own personal use, political committees are not.</p>
Provide agency recommendation for modification or elimination	<p>The Legislature could expand the personal use provisions in Election Code 253.035 to prohibit the use by any person of any political committee’s receipts for expenses that would exist irrespective of the political committee’s political activities.</p> <p>The Legislature could give TEC the authority to address fraudulent solicitation, including false claims of candidate endorsement. In addition, the Legislature could also require further disclosure from political committees to identify payments to vendors that have financial relationships with the individuals who establish or operate political committees.</p>

Describe the estimated cost savings or other benefit associated with recommended change	Political committees would be held to the same standard as candidates as it relates to personal use of funds.
---	---

<u>REDUNDANCIES AND IMPEDIMENTS NO. 9: SINGLE VENDOR FOR ELECTRONIC FILING SYSTEM</u>	
Service, statute, rule or regulation	Electronic Filing System.
Describe why the service, statute, rule, or regulation is resulting in inefficient or ineffective agency operations	TEC launched a web-based electronic filing system in 2015. The system requires continual maintenance and enhancements to stay current with the needs of filers and updates to statutes and to automate as many of the functions as possible for the convenience of both the filers and TEC staff. The system was migrated to a cloud hosted environment in 2022 but with technology continuing to evolve, TEC filers could benefit from a system with the most recent technology, rather than continuous upgrades to the current system.
Provide agency recommendation for modification or elimination	TEC is exploring whether the current electronic filing system should continue to be maintained and enhanced indefinitely or if alternate vendors and platforms should be considered. The TEC is continuing to improve the filing system to improve the user experience and automate manual processes. The TEC is also studying whether replacing the system presents a cost-effective alternative to continual maintenance and incremental improvements.
Describe the estimated cost savings or other benefit associated with recommended change	Because the current system requires hundreds of thousands of dollars for enhancements and maintenance each biennium, a new system could potentially be a cost savings for implementation in the long term.

SUPPLEMENTAL SCHEDULES
SCHEDULE A: BUDGET STRUCTURE

GOAL: ADMINISTER ETHICS LAWS. FULFILL THE AGENCY’S CONSTITUTIONAL AND STATUTORY DIRECTIVE TO ADMINISTER AND ENFORCE THE STATE’S CAMPAIGN FINANCE, LOBBY, AND OTHER RELATED ETHICS LAWS.

A.1.1 Strategy I: Disclosure Filing. **Serve as the repository for statutorily required information.**

Strategic Planning: Agency Operational Goal No. 1: Public Disclosure of Reports

Performance Measures

Outcomes: Percent of reports available for public inspection within two days

Outputs: KEY – Number of reports logged within two business days of receipt

Number of reports received and processed

Explanatory: Number of inquiries for information

Number of lobbyists registered with the Commission

Number of public officials required to file reports with the Commission

Number of reports due filed electronically

A.1.2 Strategy II: Office of the General Counsel. **Perform all legal and regulatory functions of the agency.**

Strategic Planning: Agency Operational Goal No. 2: Promote Compliance
Agency Operational Goal No. 3: Interpretation and Rulemaking

Performance Measures

Outcomes: KEY – Percent of advisory opinion requests answered within 120 days

Outputs: Number of advisory opinions adopted by the Commission

Number of Public Information Requests Responded to by the Commission

Number of unpaid fines referred to the Attorney General for collection.

Efficiencies: KEY – Average time (business days) to answer advisory opinion requests

Explanatory: Number of information requests regarding Commission administered laws

Number of advisory opinion requests received

Number of Public Information Requests Received by the Commission.

Total amount of unpaid fines referred to the Attorney General for collection

A.1.3 Strategy III: Enforcement. **Respond to complaints and enforce applicable statutes.**

Strategic Planning: Agency Operational Goal No. 4: Enforcement

Performance Measures

Outcomes: Percent of sworn complaints processed within five business days after filing

Outputs: KEY – Number of sworn complaints processed

Number of late notices sent to filers

Number of Sworn Complaints Closed

Number of Attempted Sworn Complaints that are Responded to

Efficiencies: KEY – Average business days to process sworn complaints

Average time to notify late filer of late report

Average time to notify complainants and respondents / Commission determination

Average Time to Resolve Complainants After Jurisdiction is Accepted

Explanatory: Percent of filers filing timely reports

Number of late penalties received

% complaints dismissed b/c resolution not proposed within 120 days

GOAL: INDIRECT ADMINISTRATION.

B.1.1 Strategy I: Central Administration.

Strategic Planning: Agency Operational Goal No. 5: Foster a Culture of High Performance

B.1.2 Strategy II: Information Resources.

Strategic Planning: Agency Operational Goal No. 1: Public Disclosure
Agency Operational Goal No. 5: Foster a Culture of High Performance.

SCHEDULE B: MEASURE DEFINITIONS

A.1.1 STRATEGY I: DISCLOSURE FILING. Serve as the repository for information required to be filed with the Commission and assist persons in accessing that information.

Outcome 1: Percent of reports available for public inspection within two business days.

Definition: All reports on file with the Commission are available for public viewing. The types of reports include campaign finance reports, lobby registrations, lobby activity reports, personal financial statements, and acknowledged certificates of interested parties. Reports are considered available for public inspection after they have been logged as received into the TEC's database.

Data Limitations: There is no way to "re-create" the calculations for a point in time because the TEC's database is continuously updated.

Data Source: The data is retrieved from the Commission's internal database.

Methodology: This measure is calculated by a computer generated report which: 1) subtracts the date the report was received from the date the report was logged into the database; 2) determines the number of reports logged as received within 2 business days and the total number of reports logged as received; and 3) divides the number of reports logged as received within 2 business days by the total number of reports logged as received. Business days are defined by Section 552.0031 of the Government Code.

Purpose: The ability for the public to access information on file with the Commission is central to Agency Operational Goal 1. This measure indicates how quickly the public has access to this information once it is actually received by the Commission.

Calculation Type: Non-cumulative.

Key Measure: No.

New Measure: No.

Target Attainment: Higher.

Output 1: KEY. Number of reports logged within two business days of receipt.

Definition: A report is considered available for public inspection after it has been logged as received into the database.

Data Limitations: There is no way to "re-create" the calculations for a point in time since the database is continually updated.

Data Source: The data is collected from the Commission's internal database.

Methodology: This measure is calculated by a computer-generated report that: 1) subtracts the date the report was logged as received from the date the report was logged into the database; and 2) counts the number of reports logged within two business days or less of receipt. Business days are defined by Section 552.0031 of the Government Code.

Purpose: This measure indicates the raw number of reports logged within two business days of receipt, which is necessary to derive the percentage of reports logged within two business days of receipt.

Calculation Type: Cumulative.

Key Measure: Yes.

New Measure: No.

Target Attainment: Higher.

Output 2: Number of reports received and processed.

Definition: Number of reports logged as received into the database.

Data Limitations: There is no way to “re-create” the calculations for a point in time since the database is continually updated.

Data Source: This data is collected from the Commission’s internal database.

Methodology: This is a computer-generated count of the number of reports logged as received into the database. Business days are defined by Section 552.0031 of the Government Code.

Purpose: This measure shows the volume of information received by the Commission and puts the outcome measure for this strategy into perspective. This number is also necessary to calculate the percentage of reports available to the public within two business days of receipt.

Calculation Type: Cumulative.

Key Measure: No.

New Measure: No.

Target Attainment: Higher.

Explanatory 1: Number of inquiries for information.

Definition: This is a count of the: 1) number of requests for information (other than open record requests and phone calls to the Legal Division) received via phone, mail or in person; and 2) the number of people who access the Commission's website.

Data Limitations: At this time it is not possible to determine if a person accessing the Commission's website is actually doing so to gather information or doing so for some other purpose.

Data Source: This data is retrieved from the Commission's internal database.

Methodology: This measure is a computer-generated count calculated by adding: 1) the number of people who access the Commission's website; and 2) the number of requests received via phone (other than phone calls to the Legal Division), mail, or in person. The count is generated for a particular date range.

Purpose: Public access to the information stored by the Commission is central to Goal 1, and this measure indicates the volume of requests received by the Commission.

Calculation Type: Non-cumulative.

Key Measure: No.

New Measure: No.

Target Attainment: Higher.

Explanatory 2: Number of lobbyists registered with the Commission.

Definition: Lobbyists are required to file an annual registration with the Commission and this is a count of the number registered. The registrations and fees are logged into the Commission's internal database.

Data Limitations: Lobbyists file on a calendar basis, so the data and calculations can be archived and re-created.

Data Source: The data is retrieved from the Commission's internal database.

Methodology: This is a computer-generated count of the number of lobbyists who file registrations with the Commission.

Purpose: The number of lobbyists registered will indicate the number of lobbyists that will be registered for the year.

Calculation Type: Non-cumulative.

Key Measure: No.

New Measure: No.

Target Attainment: Higher.

Explanatory 3: Number of public officials required to file reports with the Commission.

Definition: This measure is a count of the number of public officials that are required to file a campaign finance report, personal finance statement, or both with the Commission. These filers are entered into the Commission's internal database.

Data Limitations: There is no way to "re-create" the calculations for a point in time since the database is continually updated.

Data Source: The data is retrieved from the Commission's internal database.

Methodology: This is a computer-generated count of the number of public officials required to file reports with the Commission.

Purpose: The number of public officials required to file will indicate the approximate number of reports that can be expected to be filed.

Calculation Type: Non-cumulative.

Key Measure: No.

New Measure: No.

Target Attainment: Higher.

Explanatory 4: Number of reports due filed electronically.

Definition: This is a count of the number of reports filed with the Commission directly over the Internet.

Data Limitations: There is no way to "re-create" the calculations for a point in time since the database is continually updated.

Data Source: This data is collected from the Commission's internal database.

Methodology: This is a computer-generated count of the number of reports marked in the database as electronically filed.

Purpose: Electronic filing is a statutory requirement for certain filers. Additionally, electronic filing is much more efficient and cost effective for the state. It allows the Commission to achieve its goals at a higher level.

Calculation Type: Non-cumulative.

Key Measure: No.

New Measure: No.

Target Attainment: Higher.

A.1.2 STRATEGY II: OFFICE OF THE GENERAL COUNSEL. Perform all legal and regulatory functions of the agency.

Outcome 1: KEY. Percent of advisory opinion requests answered with the statutory deadline.

Definition: An opinion request is considered received on the business day it is received, or if received during a non-business day or outside of regular business hours, on the next business day. An opinion request is considered answered the date the advisory opinion request file is closed. The closing date is the meeting date the opinion is adopted or, if not adopted, the date the file is closed by the Executive Director. A file may be closed by the Executive Director for the following reasons: 1) the opinion request is withdrawn by the requestor; or 2) there are insufficient votes for the Commission to adopt an opinion.

Data Limitations: This data is very reliable.

Data Source: The data is retrieved from an internal database.

Methodology: This measure is calculated by dividing the total number of opinion requests answered into the number of opinion requests answered within 120 business days from receipt. Business days are defined by Section 552.0031 of the Government Code.

Purpose: Statutorily, advisory opinion requests must be answered within 60 days. The Commission has the authority to extend this period by vote for two 30-day periods.

Calculation Type: Cumulative.

Key Measure: Yes.

New Measure: No.

Target Attainment: Higher.

Output 1: Number of advisory opinions adopted by the Commission.

Definition: An opinion is considered adopted the date of the meeting the Commission votes to adopt the opinion.

Data Limitations: This data is very reliable.

Data Source: The data is retrieved from an internal database.

Methodology: This measure is a manual count of the number of opinions adopted by the commission.

Purpose: The Commission is required by law to issue advisory opinions on request. The advisory opinions clarify the law and provide a defense to prosecution or the imposition of civil penalties for reasonable reliance.

Calculation Type: Cumulative.

Key Measure: No.

New Measure: No.

Target Attainment: Higher.

Output 2: Number of PIA requests responded to by the Commission.

Definition: The agency is required to respond within certain deadlines to each request for documents made under the Texas Public Information Act (the "PIA"). A request is responded to when the agency: (1) provides all requested documents to the requestor, (2) notifies the requestor that the agency has no responsive documents, or (3) requests an opinion from the Office of Attorney General regarding the applicability of the PIA.

Data Limitations: This data is very reliable.

Data Source: The data is retrieved from an internal database.

Methodology: This measure is a manual count of the number of requests responded to by the Commission.

Purpose: The Commission is required by law to respond to requests made under the Public Information Act.

Calculation Type: Cumulative.

Key Measure: No.

New Measure: No.

Target Attainment: Higher.

Output 3: Number of filers referred to the Attorney General for the collection of unpaid fines.

Definition: When a filer fails to pay a fine(s) assessed by the Commission in a timely manner, and the amount owed exceeds the Attorney General's referral threshold of \$1,000, the Commission refers the matter to the Attorney General for the initiation of a collection lawsuit.

Data Limitations: This data is very reliable.

Data Source: The data is retrieved from an internal database.

Methodology: This measure is a manual count of the number of filers referred to the Attorney General.

Purpose: The Commission does not have the authority to pursue collection matters on its own. This measure tracks the number of filers who owe the State at least \$1,000 for violating a law under the Commission's enforcement jurisdiction.

Calculation Type: Cumulative.

Key Measure: No.

New Measure: No.

Target Attainment: Lower.

Efficiency 1: KEY. Average time (business days) to answer advisory opinion requests.

Definition: An opinion request is considered received on the business day it is received, or if received during a non-business day or outside of regular business hours, on the next business day. An opinion request is considered answered the date the advisory opinion request file is closed. The closing date is the meeting date the opinion is adopted or, if not adopted, the date the file is closed by the Executive Director. A file may be closed by the Executive Director for the following reasons: 1) the opinion request is withdrawn by the requestor; or 2) there are insufficient votes for the Commission to adopt an opinion.

Data Limitations: This data is very reliable.

Data Source: The data is retrieved from the Commission's internal database.

Methodology: This measure is calculated by a manual count of the total number of days to respond to a legal advisory opinion. Response time is calculated by counting the number of days between the received date and closing date. The average is then determined by dividing the total number of days to respond by the total number of requests answered. Business days are defined by Section 552.0031 of the Government Code.

Purpose: This is an indication of the efficiency of the Commission.

Calculation Type: Non-cumulative.

Key Measure: YES.

New Measure: No.

Target Attainment: Lower.

Explanatory 1: Number of information requests regarding Commission administered laws.

Definition: This is a count of the number of requests for information from the public regarding laws administered and enforced by the Commission, questions concerning filing instructions, and guidelines on the sworn complaint process that are received and answered in phone calls or emails by the Office of the General Counsel.

Data Limitations: The large majority of the phone calls and emails relate to legal guidance. However, it is not possible to determine the precise number.

Data Source: Telephone data is calculated using the Cisco VOIP Call Record Details (CDR) gathered from the VOIP telephone system provided to the Commission by the Capitol Complex Telephone system (CCTS) division of the Department of Information Resources (DIR). Email data is collected from the agency's internal email system.

Methodology: This measure is a count of the number of incoming and outgoing phone calls and emails of the Office of the General Counsel. The count is generated for a particular date range.

Purpose: This measure is an indication of workload handled by the Office of the General Counsel, which is responsible for providing guidance regarding laws governed by the Commission.

Calculation Type: Non-cumulative.

Key Measure: No.

New Measure: No.

Target Attainment: Higher.

Explanatory 2: Number of advisory opinion requests received.

Definition: An opinion request is considered received on the business day it is received, or if received during a non-business day or outside of regular business hours, on the next business day. An opinion request is considered answered the date the advisory opinion request file is closed. The closing date is the meeting date the opinion is adopted or, if not adopted, the date the file is closed by the Executive Director. A file may be closed by the Executive Director for the following reasons: 1) the opinion request is withdrawn by the requestor; 2) there are insufficient votes for the Commission to adopt an opinion.

Data Limitations: This data is very reliable.

Data Source: The data is retrieved from the Commission's internal database.

Methodology: This measure is a manual count of the number of opinion requests received.

Purpose: This is one indication of the workload on the Commission's advisory opinion staff.

Calculation Type: Non-cumulative.

Key Measure: No.

New Measure: No.

Target Attainment: Higher.

Explanatory 3: Number of PIA requests received.

Definition: The Commission is required to respond within certain deadlines to each request for documents made under the Texas Public Information Act (the "Act").

Data Limitations: This data is very reliable.

Data Source: The data is retrieved from an internal database.

Methodology: This measure is a manual count of the number of requests received by the Commission.

Purpose: The Commission is required by law to respond to requests made under the Public Information Act.

Calculation Type: Cumulative.

Key Measure: No

New Measure: No

Target Attainment: Higher

Explanatory 4. Total amount of unpaid fines referred to the Attorney General for collection.

Definition: When a filer fails to pay a fine(s) assessed by the Commission in a timely manner, and the amount owed exceeds the Attorney General's referral threshold of \$1000, the Commission refers the matter to the Attorney General for the initiation of a collection lawsuit.

Data Limitation: This data is very reliable.

Data Source: The data is retrieved from an internal database.

Methodology: This measure is a manual count of the amount of unpaid fines referred to the Attorney General.

Purpose: The Commission does not have the authority to pursue collection matters on its own. This measure tracks the total amount of unpaid fines owed by filers who owe the State at least \$1,000 for violating a law under the Commission's enforcement jurisdiction.

Calculation Type: Cumulative.

Key Measure: No.

New Measure: No.

Target Attainment: Low.

A.1.3 STRATEGY III: ENFORCEMENT. Respond to complaints and enforce applicable statutes.

Outcome 1: % of sworn complaints processed within five business days after filing.

Definition: A sworn complaint is considered processed the date the notice of compliance, non-compliance, or no jurisdiction is sent. The Commission must determine whether a sworn complaint is in an acceptable format according to the guidelines set by law. The Commission must also determine whether it has jurisdiction over the allegation made in the complaint. Once the determination of compliance, non-compliance, or no jurisdiction has been made, the Commission is required by law to notify the complainant and respondent of that determination in writing. This notification must be sent no later than 5 business days after the date the complaint is filed. The date the notice is sent and the date a complaint is filed are recorded in a database.

Data Limitations: This data is very reliable.

Data Source: The data is retrieved from the Commission's internal database.

Methodology: This measure is calculated by a computer-generated report which subtracts the date the complaint is filed from the date the notice of compliance, non-compliance, or no jurisdiction is sent. The computer then counts how many complaints were processed within five business days and how many complaints total were processed. Finally, the number of complaints processed within five business days is divided by the total number of complaints processed. Business days are defined by Section 552.0031 of the Government Code.

Purpose: This measure directly relates to the Commission's Goal 1 objective of responding to sworn complaints in a timely manner.

Calculation Type: Non-cumulative.

Key Measure: No.

New Measure: No.

Target Attainment: Higher.

Output 1: KEY. Number of sworn complaints processed.

Definition: A sworn complaint is considered processed the date the note of compliance, non-compliance, or no jurisdiction is sent. The Commission must determine whether a sworn complaint is in an acceptable format according to the guidelines set by law. The Commission must also determine whether it has jurisdiction over the allegation made in the complaint. Once the determination of compliance, non-compliance, or no jurisdiction has been made, the Commission is required by law to notify the complainant and respondent of that determination in writing. This notification must be sent no later than five business days after the complaint is filed. The date the notice is sent and the date a sworn complaint is filed are recorded in a database.

Data Limitations: This data is very reliable.

Data Source: The data is retrieved from the Commission's internal database.

Methodology: The number of sworn complaints processed is calculated by a computer-generated report that counts the number of notices sent. Business days are defined by Section 552.0031 of the Government Code.

Purpose: This measures a significant portion of the workload performed by the enforcement division and puts some of the outcome percentages into perspective.

Calculation Type: Cumulative.

Key Measure: Yes.

New Measure: No.

Target Attainment: Higher.

Output 2: Number of late notices sent to filers.

Definition: Three possible notices can be sent in regard to a late report: 1) a preliminary late notice, 2) a late notice after 30 days, and 3) a letter of referral to the Attorney General for collection of the late penalty, and the Comptroller for warrant hold proceedings.

Data Limitations: This data does not account for filers who receive late notices and then subsequent waivers for the penalty.

Data Source: The data is retrieved from the Commission's internal database.

Methodology: This measure is a computer-generated count of the number of late notices sent to filers who have not resolved the late filing at the time the notice is mailed out.

Purpose: This measure indicates the number of filers who are in possible non-compliance with the laws administered and enforced by the Commission.

Calculation Type: Cumulative.

Key Measure: No.

New Measure: No.

Target Attainment: Higher.

Output Measure: Number of Complaints Closed.

Definition: A sworn complaint is closed when it is dismissed, withdrawn, or resolved by a final order issued by the Commission or an order that is agreed to by the respondent. The date a sworn complaint is closed is recorded in a database.

Data Limitations: This data is very reliable.

Data Source: The data is retrieved from the Commission's internal database.

Methodology: This measure is a computer generated count of the number of sworn complaints closed within a specified date range.

Purpose: This measure directly relates to the Commission's Goal 1 objective by responding to sworn complaints in a timely manner.

Calculation: Cumulative.

Key: No.

New Measure: No.

Target Attainment: Higher.

Output Measure: Number of Attempted Complaints Responded to.

Definition: An attempted complaint is a written allegation of a violation that is submitted to the commission and that is not on the commission's sworn complaint form. An attempted complaint is responded to when the agency: (1) sends a written response by physical mail or email, or (2) responds by telephone. The number of attempted complaints that are responded to is recorded in a database.

Data Limitations: This data is very reliable.

Data Source: The data is retrieved from the Commission's internal database.

Methodology: This measure is a computer generated count of the number of attempted complaints responded to within a specified date range.

Purpose: This measure directly relates to the Commission's Goal 1 objective by responding to sworn complaints in a timely manner.

Calculation: Cumulative.

Key: No.

New Measure: No.

Target Attainment: Higher.

Efficiency 1: KEY. Average business days to process sworn complaints.

Definition: A sworn complaint is considered processed the date the note of compliance, non-compliance, or no jurisdiction is sent. The Commission must determine whether a sworn complaint is in an acceptable format according to the guidelines set by law. The Commission must also determine whether it has jurisdiction over the allegation made in the complaint. Once the determination of compliance, non-compliance, or no jurisdiction has been made, the Commission is required by law to notify the complainant and respondent of that determination in writing. This notification must be sent no later than 5 business days after the date the complaint is filed.

Data Limitations: This data is very reliable.

Data Source: The data is retrieved from the Commission's internal database.

Methodology: The date the notice is sent and the date a sworn complaint is filed are recorded in a database. This measure is calculated by a computer-generated report which: 1) subtracts the date the complaint was filed from the date the complaint was processed ; 2) adds the total number of business days to process sworn complaints; and 3) divides the total number of business days to process sworn complaints by the number of sworn complaints processed (responded to). Business days are defined by Section 552.0031 of the Government Code.

Purpose: This measure directly relates to the Commission's strategic objective of responding to sworn complaints in a timely manner.

Calculation Type: Non-cumulative.

Key Measure: Yes.

New Measure: No.

Target Attainment: Lower.

Efficiency 2: Average time to notify late filer of late report.

Definition: This is a measure of the number of business days between the date a report was due and the date the preliminary late notice is sent.

Data Limitations: This data does not account for reports that may be missed or for filers who may have received waivers.

Data Source: The data is retrieved from the Commission's internal database.

Methodology: This measure is a computer-generated report that counts the number of business days between the date a report was due and the date the preliminary late notice is sent. The total number of business days to send a preliminary late notice is then divided by the number of late notices sent. Business days are defined by Section 552.0031 of the Government Code.

Purpose: This is an indication of the efficiency of the Disclosure Filing Division.

Calculation Type: Non-cumulative.

Key Measure: No.

New Measure: No.

Target Attainment: Lower.

Efficiency 3: Average time to notify complainants and respondents/Commission Final Disposition.

Definition: Once the Commission has made a final disposition on a sworn complaint, the Commission must notify the complainant and respondent in writing. The date of determination is the date the Commission meets for review of the complaint. A final disposition occurs when a complaint is officially closed. A complaint is closed when the Commission votes to dismiss the complaint, or if a violation has occurred, the date on which the Commission signs the order. For complaints in which a respondent signs an order that is subject to final approval by the Commission, the complaint is closed when the Commission votes to adopt the order. This date is recorded in a database. The date the notification of final disposition is sent to the complainant and respondent is also recorded in the database.

Data Limitations: This data is very reliable.

Data Source: The data is retrieved from the Commission's internal database.

Methodology: This measure is calculated by a computer generated report which looks at complaints over which jurisdiction was accepted and that were closed during the measure reporting period and: 1) subtracts the date of final disposition from the date the notice of final disposition is sent; 2) adds the number of business days to notify complainants and respondents of disposition; 3) divides the total number of business days to notify complainants and respondents of disposition by the total number of dispositions made. Business days are defined by Section 552.0031 of the Government Code.

Purpose: This measure directly relates to the Commission's strategic objective of responding to sworn complaints in a timely manner.

Calculation Type: Non-cumulative.

Key Measure: No.

New Measure: No.

Target Attainment: Lower.

Efficiency Measure: Average Time to Resolve Complaints After Jurisdiction is Accepted

Definition: Once the commission determines that a sworn complaint complies with the legal and technical requirements and is within the commission's jurisdiction, the commission must notify the complainant and respondent in writing of the decision that jurisdiction has been accepted over the complaint. The date the notification of determination is sent to the respondent is recorded in a database. The date a complaint is resolved (or "closed") is also recorded in a database.

Data Limitations: This data is very reliable.

Data Source: The data is retrieved from the Commission's internal database.

Methodology: This measure is calculated by a computer generated report which: 1) takes the total number of complaints closed in a period and extracts from that total the complaints over which jurisdiction was accepted; 2) for each complaint, subtracts the number of calendar days from the date the notice of jurisdiction was sent from the date of resolution; 3) adds the number of calendar days for each complaint; 4) divides the total number of calendar days by the total number of complaints.

Purpose: This measure directly relates to the Commission's Goal 1 objective by responding to sworn complaints in a timely manner.

Calculation: Non-cumulative.

Key: No.

New Measure: No.

Target Attainment: Lower.

Explanatory 1: Percent of filers filing timely reports.

Definition: A report filed on paper or diskette/CD is considered timely filed if it is either hand-delivered, or deposited with the U.S. Post Office, or placed in the hands of a common or contract carrier properly addressed with postage and handling charges pre-paid no later than 5:00 p.m. on the deadline date. A report transmitted by Internet is

considered timely filed if it is successfully transmitted in the correct format by midnight, Central Time Zone, on the date of the filing deadline.

Data Limitations: This data is very reliable.

Data Source: The data is retrieved from the Commission's internal database.

Methodology: To calculate this measure a computer-generated count of the number of reports filed timely is divided by the number of reports due for a given deadline. The number of reports due is also a computerized count.

Purpose: This is an indication of how effectively the Commission communicates filing information.

Calculation Type: Non-cumulative.

Key Measure: No.

New Measure: No.

Target Attainment: Higher.

Explanatory 2: Number of late penalties received.

Definition: This measure is a count of the number of penalty payments received.

Data Limitations: This data is very reliable.

Data Source: The data is retrieved from the Commission's internal database.

Methodology: This measure is a computer-generated count of the number of penalties received in response to late filings of reports.

Purpose: This indicates the number of penalties enforced by the Commission.

Calculation Type: Non-cumulative.

Key Measure: No.

New Measure: No.

Target Attainment: Higher.

Explanatory 3: Percent of complaints dismissed because resolution was not proposed within 120 days.

Definition: Not later than the 120th day after the later of the date the Commission receives a respondent's response to a notice of complaint or a response to written questions, the Commission must propose an agreement to the respondent to settle the complaint without

holding a preliminary review hearing, or dismiss the complaint. A resolution is proposed when a proposed agreement is sent by the Commission, or when a proposed agreement is sent by staff, subject to the final approval of the Commission. For this measure, a complaint is considered dismissed when dismissed by operation of law on the grounds the Commission failed to propose an agreement to resolve the complaint within 120 days under Section 571.1242(g) of the Gov't Code. The date the respondent's initial response to a notice of complaint is received, the date the response to written questions, if any, is received, the date a proposed resolution is sent, and the date a complaint is dismissed are all recorded in a database.

Data Limitations: This data is very reliable.

Data Source: The data is retrieved from the Commission's internal database.

Methodology: This measure is calculated by a computer-generated report that divides the number of sworn complaints by the number of sworn complaints dismissed on the ground that the Commission failed to propose an agreement to resolve the complaint within 120 days after the later of the date the Commission receives the respondent's response to the notice of complaint or the date the Commission receives the respondent's response to written questions, if any.

Purpose: This measure directly relates to the Commission's strategic objective of responding to sworn complaints in a timely manner.

Calculation Type: Cumulative.

Key Measure: No.

New Measure: No.

Target Attainment: Lower.

SCHEDULE C: HISTORICALLY UNDERUTILIZED BUSINESS PLAN

HUB Reporting

The Texas Ethics Commission (TEC) is fully committed to executing a fair, open, and competitive procurement process. The TEC continues to follow the laws related to Historically Underutilized Businesses (HUBs)/VetHUB and, when possible, indirectly through subcontracting opportunities.

Attainment

The agency attained or exceeded all three, or 100%, of the applicable statewide HUB procurement goals for FY2024 and 2025. The agency exceeded its performance measure objective in the Strategic Plan of Utilizing HUBs in at least 20% of the total value of contracts awarded. The TEC will continue to follow the laws and rules related to HUB contracting to meet statewide goals and will follow the guidelines established in 34 Tex. Admin Code § 20.284 to achieve the statewide goals.

“Good Faith” Efforts

- The agency made and will continue to make the following good-faith efforts to comply with the statewide HUB/VetHUB procurement goals per Article IX of the 2026-2027 General Appropriations Act (GAA) Section 7.06 and 7.07, and Government Code § 2161.123. Encourage prospective vendors to register with the Comptroller of Public Accounts in order to obtain HUB status.
- Ensure that maximum number of active VetHUB vendors are solicited during the procurement process.
- Verify HUB status with both the DIR and Comptroller’s USAS databases before selecting a vendor.

The TEC will continue to strengthen its agency’s HUB/VetHUB program by working to increase HUB/VetHUB participation opportunities in all categories.

HUB Category	FY 2024-2025 Agency HUB Goal	FY 24 Actual % Spent w/HUB	FY 24 Actual \$ Spent w/HUB	FY 25 Actual % Spent w/HUB	FY 25 Actual \$ Spent w/HUB	FY 26 Agency Specific HUB Goal
Heavy Construction	11.20%		\$		\$	%
Building	21.10%		\$		\$	%
Special Trade	32.90%		\$		\$	%
Professional	23.70%	100.00%	\$3,860.00	100.00%	\$4,040.00	0.000%
Other Services	26.00%	67.60%	\$453,920.00	54.08%	\$493,642.00	1.00%
Commodity Purchasing	21.10%	45.79%	\$59,533.00	3.92%	\$1,105.00	1.00%
Total			\$517,313.00		\$498,787	

SCHEDULE F: WORKFORCE PLAN

AGENCY OVERVIEW

The Texas Ethics Commission (TEC) was created effective January 1, 1992, by a voter-approved constitutional amendment. This amendment added Section 24a to Article III of the Texas Constitution establishing an eight-member commission with four members appointed by the Governor, and two each by the Lieutenant Governor and the Speaker of the Texas House of Representatives. Appointees are selected from lists submitted by the Texas Senate and the Texas House of Representatives.

AGENCY MISSION

The TEC's mission is to promote public confidence in government.

BUSINESS FUNCTIONS

The TEC has both constitutional and statutory duties. Constitutionally, the TEC is authorized to recommend the salary of members of the Legislature and the Lieutenant Governor, subject to approval by the voters; and sets the per diem for members of the Legislature and the Lieutenant Governor. Statutorily, TEC is responsible for administering and enforcing the laws concerning campaign finance and political advertising, lobby activity, personal financial disclosure by state officers, the standards of conduct and conflicts of interest of state officers and employees, and several other laws regulating the reporting requirements of other state and local officials and entities.

In FY 2026, TEC was authorized 31.4 FTEs but requires for 31.8 FTEs. The TEC's mission is carried out through the following five divisions.

- Disclosure Filings (Strategy A.1.1)
- Office of the General Counsel (Strategy A.1.2)
- Enforcement (Strategy A.1.3)
- Central Administration (Strategy B.1.1)
- Computer Services (Strategy B.1.2)

ANTICIPATED CHANGES TO THE MISSION, STRATEGIES AND GOALS OVER THE NEXT FIVE YEARS

The TEC's mission and goals remain steady with no anticipation of changes to its strategies or goals over the next five years. However, TEC continues to implement procedures to improve its filing system by automating manual processes involved in processing filings and posting them on the website and improving the public's ability to review and analyze the data in the public disclosure filings.

ADDITIONAL CONSIDERATIONS

Challenges to Providing Competitive Salaries

The Ethics Commission considers its staff to be its most valuable resource and is committed to recruiting and retaining highly qualified employees for the State of Texas. To address turnover and support retention efforts, the agency has implemented measures such as one-time merit awards for employees who exceed performance standards, as well as flexible work schedule options.

During the Eighty-Ninth Legislative Session, the Legislature approved targeted appropriations of \$51,300 in fiscal year 2026 to provide a 6% salary adjustment for qualified attorneys, along with \$20,697 in fiscal year 2026 for salary adjustments to two exempt positions to address pay disparities. These increases were expressly limited to those categories.

No cost-of-living adjustments were authorized for other staff. Employees not classified as attorneys were excluded from salary increases during the Eighty-Ninth Legislative Session.

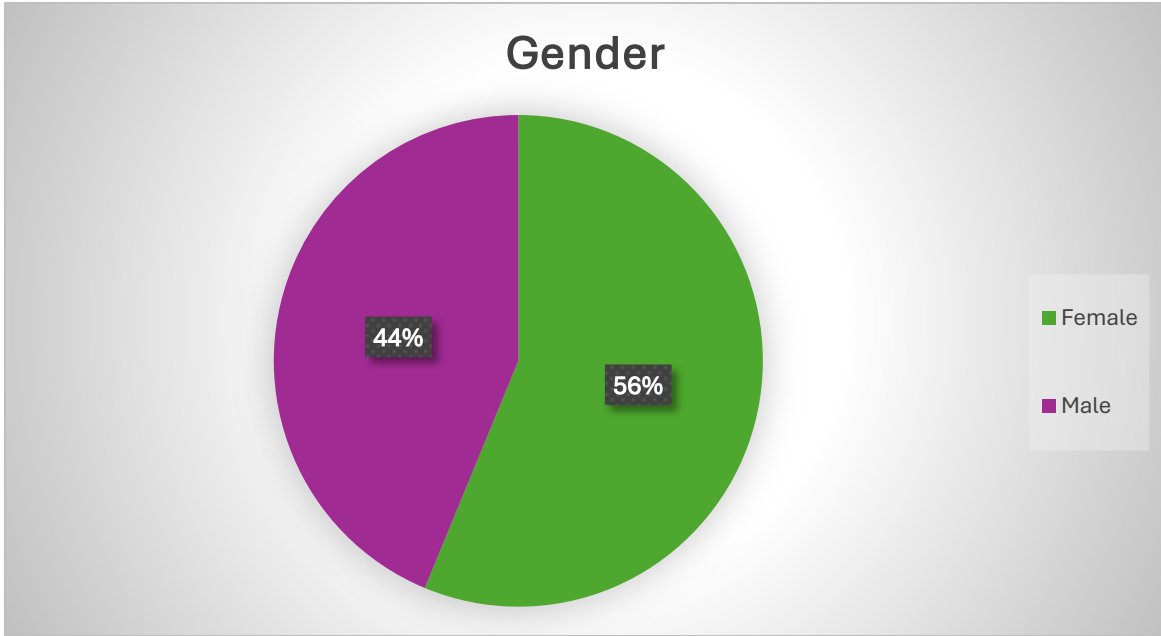
CURRENT WORKFORCE PROFILE (SUPPLY ANALYSIS)

CRITICAL WORKFORCE COMPETENCIES

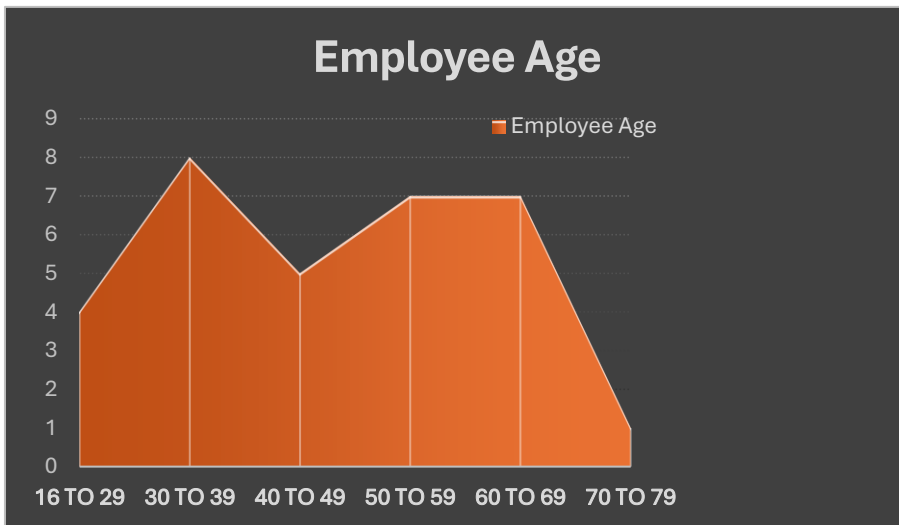
There are several critical skills that are important to the TEC's ability to fulfill its constitutional and statutory duties. Without these skills, the TEC could not comply with its goals and mission. The skills needed include: critical thinking, ability to interpret legislation; communication, organization, ability to write guidelines and procedures, legal research, problem solving, ability to develop long-term and short-term goals, strategic planning, risk management, financial management, ability to develop and monitor complex contracts, leadership development, willingness to learn, analyze security of information systems and data, implement security measures for computer or information systems, computer programming, develop diagrams or flow charts of system operations, and quality assurance skills.

WORKFORCE DEMOGRAPHICS

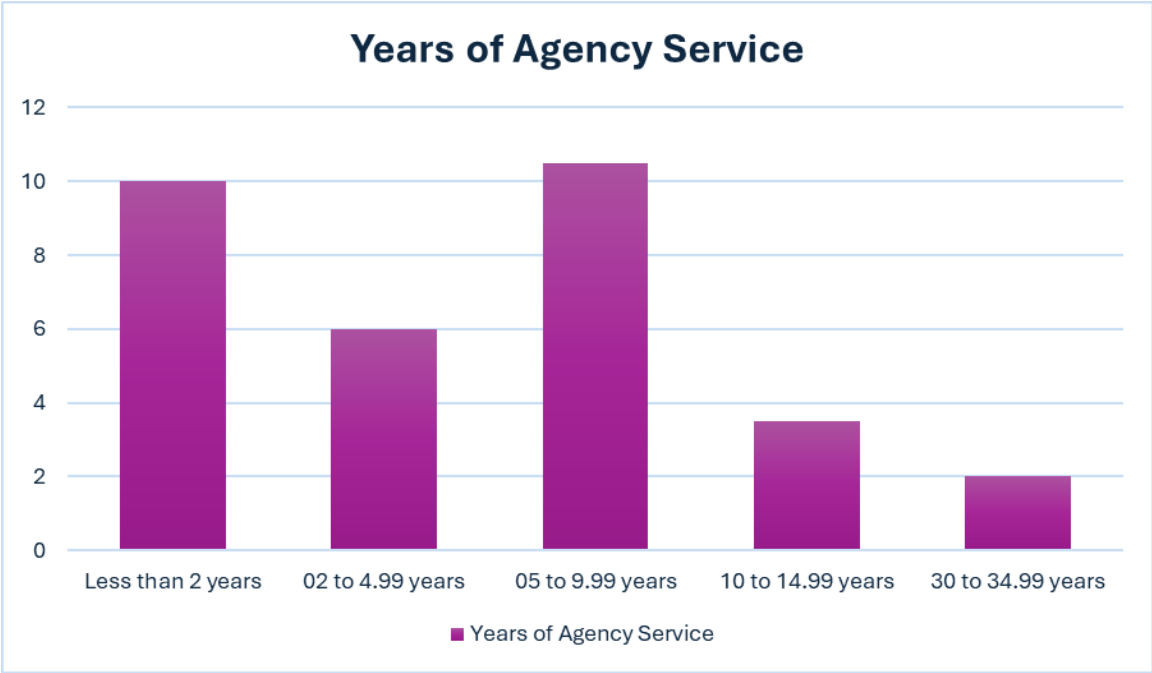
The following chart profiles TEC's total workforce. As of April 30, 2026, TEC's total headcount is 32 employees. This includes 31 full-time and one part-time employee. TEC's workforce is comprised of 56.25 percent female and 43.75 percent male. The ethnic group composition is 50 percent White, 28.12 percent Hispanic, 9.37 percent African American, 6.25 percent Two or More Ethnic Groups and 6.25 percent Asian. The average age of our employees is 46, with 62.5 percent of our employees over the age of 40. The average length of service is 6.32 years, with approximately 50 percent of our employees having less than five years of agency service, indicating the need for continuing strong training programs to ensure our employees are well-trained to serve the State of Texas.



Source: SAO Electronic Classification Analysis System (E-Class)-Fiscal Year 2026 employees by Gender with modifications and the Centralized Accounting and Payroll/Personnel System (CAPPS).



Source: SAO Electronic Classification Analysis System (E-Class)-Fiscal Year 2026 employees by Gender with modifications and the Centralized Accounting and Payroll/Personnel System (CAPPS).



Source: SAO Electronic Classification Analysis System (E-Class)-Fiscal Year 2026 Number of employees by Length of Agency Service, with modifications and the Centralized Accounting and Payroll/Personnel System (CAPPS).

EMPLOYEE ETHNICITY BY EEO JOB CATEGORY

The following table compares the percentage of African American, Hispanic, and female Commission employees as of April 30, 2026, to the State Agencies Workforce Composition (FY 2025 is the most current on the Workforce Commission’s website).

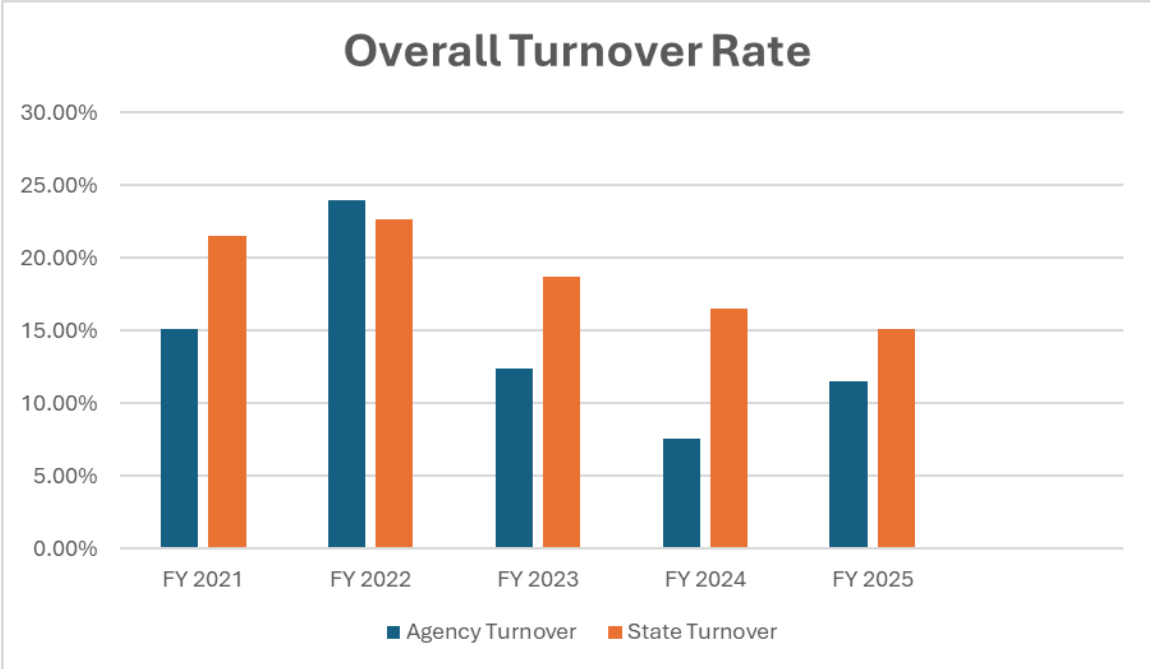
Job Category	African American		Hispanic American		Females	
	TEC %	State %	TEC%	State %	TEC %	State %
Officials, Administration (A)	0%	13%	30.7%	16.6%	30.7%	58.7%
Administrative Support (C)	0%	17.8%	0%	34.1%	100%	80.6%
Service and Maintenance (M)	0%	22.8%	0%	37.9%	0%	45.7%
Professional (P)	0 %	11.5%	31.8%	18.2%	27.270 %	59.1%
Para-Professional(Q)	22.22%	34.9%	55.55%	30.1%	22.22%	70.6%
Protective Services (R)	0%	40%	0%	24.7%	0%	49.0%
Skilled Craft (S)	0%	8.5%	0%	28.0%	0%	7.1%
Technicians (T)	22.22%	17.5%	22.22%	28.1%	0%	58.7%
total						

Sources for State %: TWC EEO & Minority Hiring Practices Report FY 2023-2024 and Source: SAO Electronic Classification Analysis System (E-Class)-Fiscal Year 2026 number of employees by EEO Category, Ethnicity, And Gender% calculated based on # of FTE in that category and the Centralized Accounting and Policy/Personnel System (CAPPS).

AGENCY TURNOVER

TEC is a small agency where the loss of a single employee could have a profound effect. Therefore, TEC works to retain employees—and if they leave are assured that their institutional knowledge does not leave with them. To that end the TEC has emphasized succession planning by keeping job descriptions and written processes up-to-date and training potential successors.

The following charts show the TEC’s turnover rate compared to the state percentages (employees who transferred to another state agency are included in the chart below), as well as a breakdown of the turnover data according to the length of agency service and age of the separating employees. Over the past five years (from September 1, 2021, to August 31, 2025), the TEC turnover rate has averaged 14.12 percent, which is below the statewide five-year average of 18.9 percent.



Source: SAO Classified Employee Turnover for FY 2021-2025 reports.

As of April 30, 2026, the TEC’s overall agency turnover rate is 12.5 percent of the current fiscal year 2026.

Turnover by Length of Service

The TEC’s greatest area of turnover has been with employees who have 10-15 years of experience. This group accounted for an average of 20.38 percent of the turnover over the past five years. Reasons cited for departure include low pay, limited room for advancement, and retirement. The chart below is calculated by identifying the overall number of employees by length of agency service and comparing that to the number who termed, retired or who transferred to another state agency.

	FY 2021 TEC %	FY 2021 State %	FY 2022 TEC %	FY 2022 State %	FY 2023 TEC %	FY 2023 State %	FY 2024 TEC %	FY 2024 State %	FY 2025 TEC %	FY 2025 State %
Less than 2 Years	10.3%	53%	17.4%	48.6%	23.5%	39.8%	12.5%	38.9%	33.3%	34.1%
02 to 4.99 Years	12.1%	17%	48%	22.4%	0%	16.8%	0%	12.2%	0.00%	13.1%
05 to 9.99 Years	0.00%	10.2%	0.00%	12.8%	0.00%	10.1%	0.00%	7.9%	10.5%	8.0%
10 to 14.99 Years	28.6%	9.9%	0%	11.9%	40%	9.7%	0.00%	8.2%	33.3%	8.3%
15 to 19.99 Years	80%	10.9%	0%	11.8%	0%	9.3%	400%	7.7%	0.00%	8.6%
20 to 24.99 Years	0.00%	14.9%	0.00%	13.7%	0.00%	11.8%	0.00%	10.4%	0.00%	13.9%
25 to 29.99 Years	0%	23.7%	0%	25%	0.00%	20.4%	0.00%	16.5%	0.00%	20.2%

Source: SAO Electronic Classification Analysis System (E-Class) - Includes interagency transfers and SAO Annual Report of Classified Employee Turnover for Fiscal Year 2021-2026 Turnover rate is not the sum of percentages but based on number of separations and average agency headcount.

During Fiscal Years 2021 through 2026, the TEC experienced the departure of 24 full-time employees (FTEs). Of those departures, seven were for personal reasons, two were involuntary separations, four resigned to pursue opportunities in the private sector, four employees retired and seven employees transferred to other state agencies. All seven employees who transferred to other state agencies received salary increases upon accepting their new positions.

As a small agency with a limited annual budget, the TEC faces ongoing challenges in maintaining competitive compensation levels and providing meaningful salary increases. These challenges are significant given that 34.37 percent of TEC employees are attorneys whose position requires active professional licensure, continuing legal education and extensive specialized training. Although TEC has historically been successful in recruiting qualified

attorneys, retaining and attracting legal talent has become increasingly difficult due to compensation gap between state employment and the private sector.

According to the Texas Labor Market Information report the median wage for Attorneys in Travis county is \$133,224. That is \$23,736.50 higher than the average attorney (\$109,487.50) salary at TEC. Additionally, the median salary for experienced attorneys in Travis County (\$216,596) exceeds the average TEC attorney salaries (\$109,487.50) by approximately \$90,000, and is \$50,000 higher than the TEC's Executive Director (\$163,221), who serves as the agency's most senior and experienced attorney.

The TEC also has difficulty recruiting and retaining skilled computer programmers. The average state employee makes \$104,000 as a computer programmer while the average in private sector is \$115,000. The average salary for TEC's three programmers is \$91,333.

Retirement Eligibility and Employee Attrition Rate over the Next Five Years

With a maturing and highly experienced workforce, 15.1 percent (4.8) of the TEC's current employees (31.8) are eligible for retirement at the end of Fiscal Year 2026. Of that group, approximately 41.66 percent (2) are management or lead staff. Another 12.57 percent (4) of the TEC's employees will be eligible for retirement within the next five years. This represents 27.67 percent of the filled full-time employee workforce (31.8), with many of these employees occupying key positions within the agency and possible payments of over \$167,376.60 in lump sum entitlements. For this reason, it is important for the TEC to ensure that the agency's knowledge and expertise is not lost. Based on past turnover trends, the projected attrition rate will be a loss of six employees per fiscal year, of which at least one will be retirees.

WORKFORCE SKILLS CRITICAL TO AGENCY MISSION AND GOALS

The TEC is fortunate to have a staff that ranges broadly in training and experience. It is critical in a small agency to have a staff that is diverse in skills because often employees are asked to perform more than one job function. For instance, one employee is the agency's Chief Financial Officer, head of Human Resources, and director of the TEC central administrations. As the TEC continues to develop its electronic filing technology the need for skilled clerical and paraprofessional workers shifts to workers with hard technical skills. The TEC needs employees skilled in database management, SQL, data visualization, and computer programming to maintain, and improve the electronic filing system and the vast amount of data it collects. The TEC hopes to leverage emerging AI technology to move more web development and computer programming in-house. But regardless of whether the anticipated efficiencies gain from AI come to fruition, the TEC needs employees well versed in the latest technology to continue to deliver value for the state.

The TEC also administers a complicated area of law that requires skilled attorneys and program specialists who can translate the arcane into plain English through advisory opinions, rules, guides and training seminars.

The following are critical skills that are important to the TEC's ability to operate and, without which, the TEC could not provide basic working functions to accomplish its strategic mission and goals.

- Customer service skills, including clear communication and patience;
- Legal research and analysis;
- Litigation skills, including written and oral advocacy and drafting discovery requests;
- Knowledge of the laws administered and enforced by the Commission;
- Reviewing and analyzing campaign finance, lobby, and other reports filed with the TEC;
- Organization skills required to administer and enforce statewide filing requirements;
- Developing and maintaining databases;
- Data-analysis and visualization;
- Administering and maintaining a network infrastructure;
- Developing and maintaining a website; and
- Developing and maintaining Java based computer programs.

FUTURE WORKFORCE PROFILE (DEMAND ANALYSIS)

CRITICAL FUNCTIONS REQUIRED TO ACHIEVE THE STRATEGIC PLAN

The following functions are critical to achieving TEC’s strategic plan:

- Receiving and maintaining data required to be filed with the Commission, both electronically and in hard copy, and assisting persons in accessing that data;
- Responding quickly, accurately, and impartially to formal requests for advisory opinions and informal requests for legal guidance;
- Enforce the laws administered by the Commission by responding quickly and impartially to sworn complaints, performing random audits; and assessing statutory penalties for late-filed reports and impartially adjudicating their appeals; and
- Educate the public, state employees, and those subject to the laws administered and enforced by the Commission.

EXPECTED WORKFORCE CHANGES

The TEC must prepare for the departure of at least two of its directors, who have reached retirement eligibility. These individuals are critical employees at the agency, responsible for overseeing the human resources, payroll, finances and operation and maintenance of TEC’s electronic filing system and public website. They have been at TEC for 31 and 15 years, during which time they have procured, managed and built many of TEC’s computer systems. One has managed TEC’s relationship with its software vendors and developed many of TEC’s internal protocols for maintaining its databases and notifying filers of pending deadlines and unpaid penalties. Their knowledge and skills will be extremely difficult for the agency to replace. When these employees retire or otherwise leave the TEC, the agency would likely need at least four new employees to cover the wide variety of responsibilities that it has come to rely on these employees to accomplish by themselves.

In addition to these potential key departures, the agency can expect, based on previous averages, to lose at least 6.8 additional employees during the next five years. Losing attorneys is particularly problematic for the TEC because of the unique and highly specialized area of law that the agency administers and enforces.

FUTURE WORKFORCE SKILLS NEEDED

Expert in data analysis and visualization

The TEC's mission, at its heart, is to inform the public about how political campaigns in Texas are financed, the activities and expenditures of lobbyists, and the financial interests of state officers and candidates. It receives and makes public large quantities of data about the political contributions and expenditures of candidates and political committees, the activities of lobbyists, and the financial interests of public officials. However, it does not currently employ an expert in data analysis and visualization that could identify new and helpful ways to communicate that data to the general public. The TEC needs to add a WordPress Designer/Engineer as well as a subject matter expert in Tableau or similar data visualization tool in order to effectively process and relay this data. As an agency that is fundamentally built around educating the public with data, the TEC believes it should add such a professional to its staff.

Web design and software programming

The TEC needs to ensure that its workforce has the skills to keep pace with rapidly changing technology. The TEC has long-term need for software engineers to maintain and improve its existing electronic filing systems (EFS) and manage technology contracts for future improvements and systems. The need for a subject matter expert on the EFS application, designing workflow and business process changes, performing value analysis for new features, defining acceptance criteria, participating in the enhancement writing/prioritizing sessions, testing functionality developed by outside vendors, fielding calls from filers, and providing feedback on UI/UIX design are some tasks the TEC will need skilled technical people to accomplish. TEC will also be looking to add an AWS System Admin/Architect to improve the following skill areas. Strengthening security and compliance in the AWS environment, improving reliability and performance through better architecture and monitoring, reduce cloud costs by optimizing resources and configurations, modernizing the application using cloud-native services where appropriate, and providing guidance, documentation, and training to support long term sustainability. Lastly TEC is looking to increase networking skills so that it can identify bottlenecks, prevent outages, and optimize performance. TEC would also not only like to strengthen cybersecurity through proper firewall configuration, access controls, and ongoing monitoring but also streamline connectivity between offices, cloud services, and remote staff. Better skilled programmers and network specialists are needed to support troubleshooting and provide faster resolution of connectivity, VPN, or infrastructure issues and plan and maintain long-term network architecture to keep systems scalable and up to date.

Attorney and Legal Staff

As the state population grows, so does TEC's regulated community of local and state candidates and officials, lobbyists, and government employees. The TEC seeks to retain and recruit skilled attorneys and staff to account for the increased volume of requests, inquiries, and complaints.

Administrative Staff

Finally, as the hiring pool gets competitive, the need to maintain and fill critical administrative roles such as an experienced contract manager, becomes imperative. TEC looks to add these critical roles.

Anticipated Increase/Decrease in the Number of Employees Needed

The agency currently is authorized 31.4 FTEs, but at current work load it must operate at 31.8 full time employees. Increasing the FTE cap authorized by the State would have a positive impact on TEC's ability to achieve its mission and statutory obligations.

STRATEGY DEVELOPMENT

Specific Goals to Address Workforce Competency Gap/Surplus

The largest gap in workforce numbers or skills the TEC faces for the next five years is retaining, recruiting, and having funding for an adequate number of employees with technical skills.

Based on the analysis of current workforce demographics, there are several issues that the TEC will continue to focus on in order to keep a competent and knowledgeable workforce that is able to accomplish its strategic mission and goals:

- When new employees are hired, the TEC strives to ensure that they are trained quickly and thoroughly so that our employees are well prepared to serve Texas;
- The TEC will seek appropriate funding to recruit and retain employees to the extent possible;
- Strengthen recruitment efforts by expanding job posting outreach to universities, professional associations, industry organizations and other targeted employment platforms to attract a broader and more qualified applicant pool;
- The TEC will continue to follow the state recruitment plan to maximize the number of qualified applicants for available positions within all job categories; and
- The TEC continues to develop in-house procedural manuals to quickly train new hires and allow cross training within.

The TEC will work to decrease its turnover rate lower than the State average by continuing to conduct exit interviews, offer the State Online Exit Survey to voluntarily separating employees, conduct employee satisfaction surveys, and assess the results to identify retention issues. As the agency foresees losing more employees to retirement over the next few years, the TEC will

continue to document working processes and procedures and cross-train employees to ensure that organizational knowledge is retained.

SCHEDULE H: REPORT ON CUSTOMER SERVICE

INTRODUCTION

The Texas Ethics Commission directs significant resources towards providing customer service, and it is proud of the results.

INVENTORY OF EXTERNAL CUSTOMERS BY STRATEGY

The Governor’s Office and the Legislative Budget Board require all state agencies to provide an inventory of their external customers organized by the strategies listed in the General Appropriations Act as well as briefly describe the types of services provided. The Texas Ethics Commission consists of the following strategies:

Strategy A1.1 Disclosure Filing

External Customers	Services Provided
Registered lobbyists; Elected and appointed public officials; Political committees registered in Texas; State agencies and employees; Candidates for office in all political subdivisions; All state political subdivisions (county, city, school, water districts, etc.); General public	Notify filers of pending deadlines; Provide assistance to filers and other users of the agency’s filing software and databases; Maintain the TEC’s publicly-accessible searchable database of disclosure reports and statements; Process requests for information made under the Public Information Act.

Strategy A1.2 Legal Guidance and Opinions

External Customers	Services Provided
Registered lobbyists; Elected and appointed public officials; Political committees registered in Texas; State agencies and employees; Candidates for office in all political subdivisions; All state political subdivisions (county, city, school, water districts, etc.); General public	Provide on-demand legal assistance for filers and the general public; Conduct educational seminars and publish plain-language legal guides; Research, draft, and publish advisory opinions in response to formal requests for guidance.

Strategy A1.3 Enforcement

External Customers	Services Provided
<p>Registered lobbyists; Elected and appointed public officials; Political committees registered in Texas; State agencies and employees; Candidates for office in all political subdivisions; All state political subdivisions (county, city, school, water districts, etc.); General public</p>	<p>Resolve sworn complaints efficiently and impartially; Notify filers of pending deadlines, issue penalties for late-filed reports, and impartially adjudicate appeals; Recover unpaid penalties and fees for deposit in the Texas General Revenue Fund.</p>

Strategy B.1.1 Central Administration

External Customers	Services Provided
<p>General public; State agencies; Former employees; Vendor community</p>	<p>Respond to general inquiries and redirect calls to other TEC divisions; Verify prior state service and report budget structure and expenditures; Procure and process contracts for goods and services; Encourage HUB participation.</p>

Strategy B.1.2 Information Resources

External Customers	Services Provided
<p>Registered lobbyists; Elected and appointed public officials; Political committees registered in Texas; State agencies and employees; Candidates for office in all political subdivisions; All state political subdivisions (county, city, school, water districts, etc.); General Public</p>	<p>Provide technical assistance to electronic filers; Maintain the TEC’s publicly-accessible searchable database of disclosure reports and statements; Processing requests for special reports made under the Public Information Act; Assisting filers with account setup and password reset.</p>

CUSTOMER SERVICE PERFORMANCE MEASURES AND METHODOLOGY

TEC's method for the collection of customer feedback was an online customer satisfaction survey located in a clearly identified prominent position on our agency's website homepage. On February 26th and 27th, 2026, an email requesting participation in the survey that included the link to the survey location was sent to 7998 TEC filers: campaign finance, lobby, PFS, all agency board members and Senior Judges.¹ Customers were given two weeks to respond to the survey. Of the 7,998 emails sent, a total of 444 responses of a completed customer service survey were received, which represents a 5.55% response rate.

The online survey identifies nine categories to which the person responding chooses to best describe himself or herself: (1) PFS filers; (2) lobby filers; (3) campaign finance filers; (4) certificate of interested parties (1295) filers; (5) received ethics training; (6) copy orders customers; (7) general public; (8) sworn complaints; and (9) other.

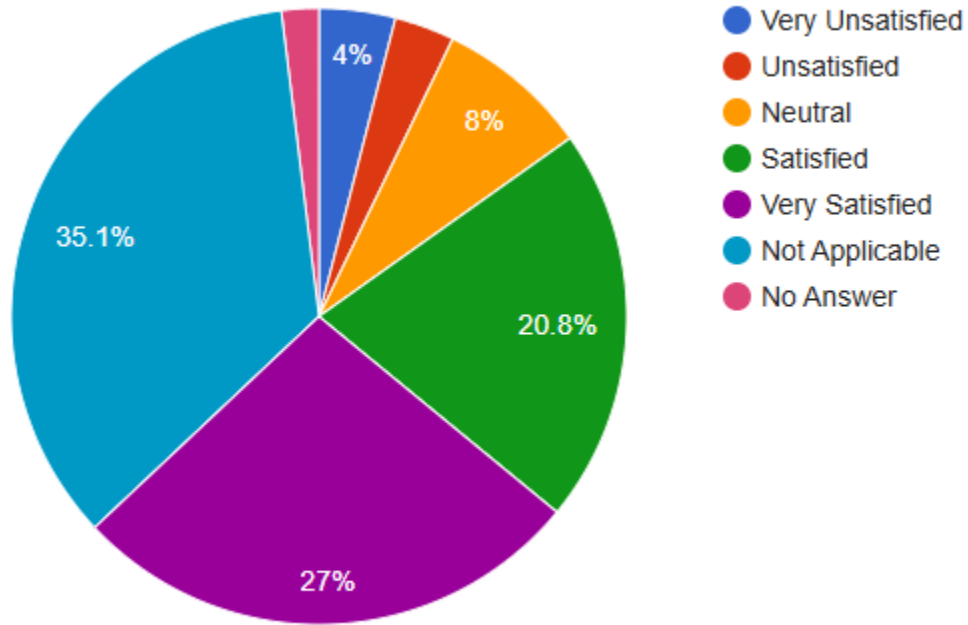
The survey was designed to gather information concerning the customer's experience with the agency in the eight customer service quality elements specified by statute: facilities, staff, communications, website, complaint, timeliness, printed information, and other. It also provides an opportunity to add comments. The following questionnaire was provided online as well as emailed to 7,998 individuals and organizations that have done business with TEC, and the charts summarizing the results follow.

¹ Some filers file multiple types of reports (campaign finance, PFS, and/or lobby) with the Commission. These filers received only a single email request to complete the Customer Satisfaction Survey.

ANALYSIS OF RESULTS

The following charts indicate by customer category the total number of responses and the average score, based on the following 1-to-5 scale: (1) Very Unsatisfied; (2) Unsatisfied; (3) Neutral; (4) Satisfied; (5) Very Satisfied; (6) N/A – Not Applicable; and (7) No Answer.

Totals



Totals (444)

	Efs	Staff	Facility	Communicate	Website	Complaint	Timeliness	Printed	Survey Overall
Very Unsatisfied	18	17	10	18	19	15	19	16	24
Unsatisfied	27	7	2	12	30	9	16	16	17
Neutral	56	19	23	34	64	40	23	34	47
Satisfied	171	58	32	116	172	30	86	118	165
Very Satisfied	165	200	29	171	130	45	148	104	178
Not Applicable*	5	143	348	93	29	305	152	156	7
No Answer*	2	0	0	0	0	0	0	0	6
Avg. Score	4.00	4.39	3.71	4.17	3.88	3.58	4.12	3.97	4.06

* not included in average score

Totals By Percent

	Ef's	Staff	Facility	Communicate	Website	Complaint	Timeliness	Printed	Survey Overall	Average
Very Unsatisfied	4.1%	5.6%	10.4%	5.1%	4.6%	10.8%	6.5%	5.6%	5.6%	6.5%
Unsatisfied	6.2%	2.3%	2.1%	3.4%	7.2%	6.5%	5.5%	5.6%	3.9%	4.7%
Neutral	12.8%	6.3%	24.0%	9.7%	15.4%	28.8%	7.9%	11.8%	10.9%	14.2%
Satisfied	39.1%	19.3%	33.3%	33.0%	41.4%	21.6%	29.5%	41.0%	38.3%	32.9%
Very Satisfied	37.8%	66.4%	30.2%	48.7%	31.3%	32.4%	50.7%	36.1%	41.3%	41.7%
Not Applicable*	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
No Answer*	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Overall Satisfaction	76.9%	85.7%	63.5%	81.8%	72.8%	54.0%	80.1%	77.1%	79.6%	74.6%

* not included in average score

Campaign Finance Filings (193)

	Ef's	Staff	Facility	Communicate	Website	Complaint	Timeliness	Printed	Survey Overall
Very Unsatisfied	8	6	5	8	7	10	9	9	12
Unsatisfied	15	5	1	6	18	6	12	8	8
Neutral	20	8	5	16	22	11	5	12	18
Satisfied	70	24	11	44	75	15	40	52	74
Very Satisfied	77	102	12	85	63	26	73	50	77
Not Applicable*	3	48	159	34	8	125	54	62	2
No Answer*	0	0	0	0	0	0	0	0	2
Avg. Score	4.02	4.46	3.71	4.21	3.91	3.60	4.12	3.96	4.04

* not included in average score

Certificate Of Interested Parties (2)

	Ef's	Staff	Facility	Communicate	Website	Complaint	Timeliness	Printed	Survey Overall
Very Unsatisfied	0	1	1	0	0	0	0	0	0
Unsatisfied	0	0	0	0	0	0	0	0	0
Neutral	0	0	0	0	0	1	0	0	1
Satisfied	2	0	0	0	2	0	1	1	0
Very Satisfied	0	1	0	2	0	0	0	0	1
Not Applicable*	0	0	1	0	0	1	1	1	0
No Answer*	0	0	0	0	0	0	0	0	0
Avg. Score	4.00	3.00	1.00	5.00	4.00	3.00	4.00	4.00	4.00

* not included in average score

General Public/Vendor (1)

	Ef's	Staff	Facility	Communicate	Website	Complaint	Timeliness	Printed	Survey Overall
Very Unsatisfied	0	0	0	0	0	0	0	0	0
Unsatisfied	0	0	0	0	0	0	0	0	0
Neutral	0	0	0	0	0	0	0	0	0
Satisfied	0	0	0	0	0	0	0	0	0
Very Satisfied	1	1	0	1	1	0	1	0	1
Not Applicable*	0	0	1	0	0	1	0	1	0
No Answer*	0	0	0	0	0	0	0	0	0
Avg. Score	5.00	5.00		5.00	5.00		5.00		5.00

* not included in average score

Lobby Filings (42)

	Efs	Staff	Facility	Communicate	Website	Complaint	Timeliness	Printed	Survey Overall
Very Unsatisfied	2	2	1	2	3	0	2	3	3
Unsatisfied	4	0	0	1	2	0	0	2	1
Neutral	7	2	5	4	9	6	2	3	5
Satisfied	11	2	5	9	14	1	10	9	11
Very Satisfied	17	27	2	18	14	5	18	13	21
Not Applicable*	1	9	29	8	0	30	10	12	0
No Answer*	0	0	0	0	0	0	0	0	1
Avg. Score	3.90	4.58	3.54	4.18	3.81	3.92	4.31	3.90	4.12

* not included in average score

Other (54)

	Efs	Staff	Facility	Communicate	Website	Complaint	Timeliness	Printed	Survey Overall
Very Unsatisfied	3	5	2	4	4	4	5	2	5
Unsatisfied	4	1	0	1	2	1	0	0	3
Neutral	11	1	1	6	14	6	5	9	6
Satisfied	21	12	3	18	21	4	13	15	24
Very Satisfied	12	17	2	12	8	0	12	10	14
Not Applicable*	3	18	46	13	5	39	19	18	2
No Answer*	0	0	0	0	0	0	0	0	0
Avg. Score	3.69	3.97	3.38	3.80	3.55	2.67	3.77	3.86	3.75

* not included in average score

PFS Filings (132)

	Efs	Staff	Facility	Communicate	Website	Complaint	Timeliness	Printed	Survey Overall
Very Unsatisfied	4	3	1	2	5	1	2	2	3
Unsatisfied	4	0	1	4	6	1	2	5	4
Neutral	15	6	10	5	15	15	10	9	14
Satisfied	60	17	11	43	53	6	20	37	50
Very Satisfied	49	44	11	43	38	12	38	25	55
Not Applicable*	0	62	98	35	15	97	60	54	3
No Answer*	0	0	0	0	0	0	0	0	3
Avg. Score	4.11	4.41	3.88	4.25	3.97	3.77	4.25	4.00	4.19

* not included in average score

Received Ethics Training (13)

	Efs	Staff	Facility	Communicate	Website	Complaint	Timeliness	Printed	Survey Overall
Very Unsatisfied	0	0	0	0	0	0	0	0	0
Unsatisfied	0	0	0	0	0	0	0	0	0
Neutral	0	0	0	0	1	0	0	0	0
Satisfied	5	2	2	2	7	3	2	3	6
Very Satisfied	8	5	2	8	5	0	4	3	7
Not Applicable*	0	6	9	3	0	10	7	7	0
No Answer*	0	0	0	0	0	0	0	0	0
Avg. Score	4.62	4.71	4.50	4.80	4.31	4.00	4.67	4.50	4.54

* not included in average score

Performance Measures Standards and Customer Satisfaction

Outcome Measures:

- 77.0% of surveyed customer respondents expressed overall satisfaction with services received.
- 5.63% of surveyed customer respondents identified ways to improve service delivery.

Output Measures:

- 444 total customers surveyed (total customers responding).
- 7,998 total customers served.

Efficiency Measures:

- \$0.00 cost per customer surveyed beyond the costs of staff time because 100% of surveys were sent via email.

Explanatory Measures:

- 7,998 total customers identified.
- 9 customer groups inventoried.



CERTIFICATE

Agency Name Texas Ethics Commision

Pursuant to Government Code, Section 2056.002(b)(12), this is to certify that the agency has complied with the cybersecurity training required under Government Code, Sections 2063.103 and 2063.104.

Chief Executive Officer or Presiding Judge

/S/ James Tinley
Signature

James Tinley
Printed Name

Executive Director
Title

01 June 2026
Date

Board or Commission Chair

/S/ Chris Flood
Signature

Chris Flood
Printed Name

Chair
Title

01 June 2026
Date



CERTIFICATE

Agency Name Texas Ethics Commission

Pursuant to Government Code, Section 2056.002(b)(12), this is to certify that the agency has complied with the Artificial Intelligence training required under Government Code, Sections 2063.103 and 2063.104.

Chief Executive Officer or Presiding Judge

/S/ James Tinley
Signature

James Tinley
Printed Name

Executive Director
Title

01 June 2026
Date

Board or Commission Chair

/S/ Chris Flood
Signature

Chris Flood
Printed Name

Chair
Title

01 June 2026
Date