



In 2025, LOFT assessed the operations of the Ethics Commission, including how the agency maintains and provides access to electronic records and how its daily operations align with its constitutional duty to make rules regulating the ethical conduct of State officials, public employees, and campaigns. LOFT also sought to identify best practices for ensuring ethical conduct of public officials and campaign finances.

LOFT found the Commission's efforts were primarily focused on making and enforcing rules pertaining to campaign finance reporting, with the Commission being reactive to complaints of other types of violations, such as conflict of interest. LOFT also found poor record keeping and data management that resulted in misplaced cases and unreconciled financials. LOFT also identified opportunities for the agency to increase the transparency and availability of documents and to improve education and guidance regarding compliance.

Last, LOFT found the agency's revolving funds receive sufficient recurring revenue to support its operations, supplementing the appropriated funds provided to the Commission. As 80 percent of the Commission's revenues are from registration fees and not penalties, LOFT found this to be a stable source of funding.







Summary of Agency Actions Since LOFT's 2025 Report

In the year after the presentation of LOFT's report, the Ethics Commission implemented systems and processes intended to standardize its work, improve internal accountability, and increase transparency and public reporting of the agency's performance. Key actions include implementing a case management system and adopting a formal review schedule of campaign finance filings. The agency also adopted a new intake process for complaints, which are reviewed and submitted to Commissioners within 30 days, and paper files have been digitized. (See [attached addendum](#) for additional information about the agency's operations).

The Ethics Commission reports implementing operational improvements such as compliance officers providing proactive guidance to filers, monitoring reporting activity, and helping to resolve reporting issues earlier and reduce late submissions. The Commission also established stakeholder working groups consisting of members of the regulated community and legislative representatives to discuss compliance scenarios, clarify reporting requirements, and provide feedback on potential rule updates. The Commission now offers a diversion program to first-time violators to resolve minor violations through compliance education. Participants have a 50 percent reduction in penalties, and it has also reduced the number of formal administrative hearings required.

The goal of Impact Evaluations is to foster accountability by assessing the status of recommendations issued in the original evaluation report and any related agency actions to address identified challenges.



| LOFT Recommendation to Agency | Status | | | Agency Comments |
|--|-----------|-------------|--|---|
| | No Action | In Progress | Complete | |
| Implement a case management system to allow for the tracking of agency resources and outcomes. | | |  | The Commission implemented the Clio case management system in December 2025, with 100 percent of new cases logged in the system beginning January 1, 2026. The agency attributes the new system with improved case tracking integrity, reduced administrative duplication, and strengthened consistency of documentation. The annual cost of the system is \$2,856 and is funded from the Commission's revolving funds. |
| Develop a schedule for reviewing campaign finance filings to ensure that every filing is reviewed for inconsistencies as it is received. This may require reducing the frequency of filings. | | |  | The Commission adopted a formal review schedule in March 2025, with all campaign filings now reviewed upon receipt using standardized review criteria. |
| Create a risk-based audit schedule that examines winning campaigns most frequently, but also audits a random selection of other campaigns. | | |  | The Commission initiated its first comprehensive audit/review cycle in February 2026, establishing a replicable, rule-based audit/review methodology for future cycles. The Commission reports this process has allowed for early identification of reporting discrepancies prior to post-election enforcement actions. |
| Require campaigns to turn over banking records for the campaign account to the Ethics Commission after the general election and when the campaign committee is dissolved. | | |  | The Commission exercises its statutory authority to request bank statements during comprehensive audits and investigative reviews. <i>(LOFT note: the Commission does not make it standard practice for a campaign to provide the records upon either the end of a campaign or the dissolution of a campaign committee; requests are only made if the campaign is selected for an audit or review.)</i> |

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| Create an annual report that makes public the metrics of the agency and the value added to the state of Oklahoma. | | | | The FY25 Annual Report was published in December 2025 and includes key performance indicators, enforcement metrics, operational improvements, and fiscal stewardship reporting. |
| Increase training offerings and educational guidance by including on the agency's public-facing website, including: <ul style="list-style-type: none"> Recorded training presentations A list of frequently asked questions and answers A list of the agency's prior responses to requests for informal guidance A schedule of in-person trainings | | | | The Commission expanded public-facing educational resources, including: <ul style="list-style-type: none"> Publicly available FAQs Advisory opinions and staff guidance Recorded training sessions Published Commission presentations The Commission credits these proactive steps for a 50% decrease in complaints. |
| Update the Ethics Rules to require a Notice of Allegations to accompany any subpoena. | | | | In April 2025, the Commission adopted a policy requiring a Notice of Investigation to accompany subpoenas, increasing procedural transparency during investigations. |
| Create a uniform policy with clear criteria for making a complaint or investigation public prior to final resolution of the case. | | | | The Commission adopted formal criteria in April 2025 governing when complaints or investigations may be made public prior to final resolution. |
| Avoid opening formal investigations into elected officials during the regular four-month Legislative Session; this would not preclude the routine review or audit of a campaign's financial records. This would be analogous to the speech or debate clause of the Oklahoma Constitution. | | | | After reviewing practices in other states, the Commission determined that suspending investigations during legislative session would be inconsistent with accountability standards. Investigations continue year-round. |
| Create a safe harbor provision for those who seek guidance from Commission staff in good faith. This would protect them from penalties, provided they follow the staff's advice. Staff advice should be logged and published on the Commission's website. | | | | While the Commission has not formally put in place protections for those seeking guidance, it documents guidance provided to individuals who seek clarification regarding compliance with the Ethics Rules prior to taking action. According to the Commission, maintaining a record of these inquiries supports transparency. |

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