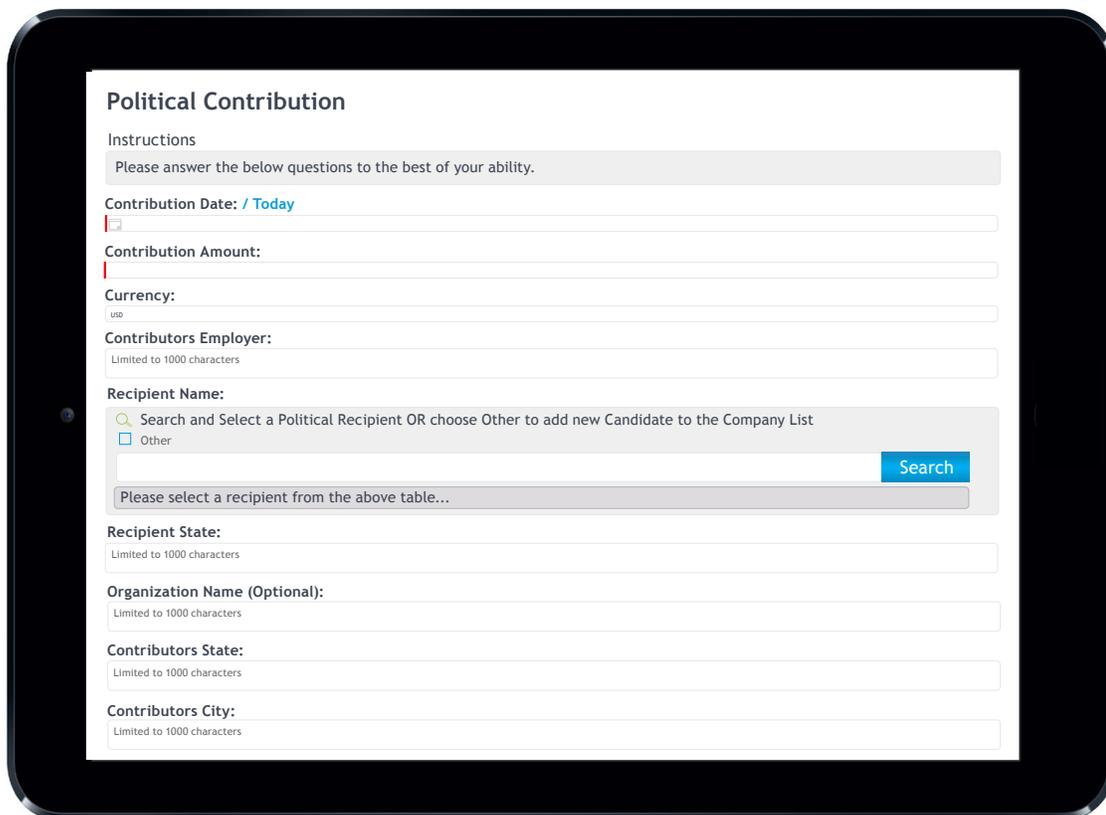# ComplySci

Political Contribution Monitoring

As people across the country are becoming more politically active, Compliance Officers must be more mindful than ever of Pay-to-Play rules. It is critical for firms to have clear processes in place for employees to pre-clear or self-report their contributions, for firms to validate that actual contributions match employees' pre-cleared or self-reported data, and for Compliance departments to verify that all contributions made by employees – and the oversight process – have been well-documented.

Pre-Clear or Self-Report Contributions

ComplySci makes it easy for employees to submit preclearance requests for their political contributions, or to self-report those contributions, through an online tool available from any desktop or mobile device.

Compliance personnel can customize these pre-clearance or reporting forms by specifying the questions, approval processes, rules, workflows, and reporting that best align with the firm's policies.

Political Contribution

Instructions

Please answer the below questions to the best of your ability.

Contribution Date: / Today

Contribution Amount:

Currency:
USD

Contributors Employer:
Limited to 1000 characters

Recipient Name:

🔍 Search and Select a Political Recipient OR choose Other to add new Candidate to the Company List
☐ Other

[   ] [Search]

Please select a recipient from the above table...

Recipient State:
Limited to 1000 characters

Organization Name (Optional):
Limited to 1000 characters

Contributors State:
Limited to 1000 characters

Contributors City:
Limited to 1000 characters

This Political Contribution preclearance form shows key information including contribution date, amount, currency, recipient name and state, etc. Compliance Supervisors can customize the questions, types of responses available, order of the questions and audience for each preclearance form.

Validate Pre-Cleared Contributions

Providing a mechanism for employees to pre-clear or self-report their political contributions is just one part of the process. The next step is to validate the accuracy of pre-cleared or disclosed contributions. Traditionally, this has been an arduous and time-consuming task. Each state and municipality and the Federal government report contributions separately, in different formats, and on different schedules.

Many firms today verify their employees' political contributions manually by visiting each individual state's website and federal databases, searching records by manually entering each employee's name. Depending on the size of the firm's employee base, this can be a herculean task that may require a dedicated full-time employee or even a team. It's also often difficult to validate out-of-state contributions using a manual look-up process.

Because of the time and expense this type of manual process requires, some firms are only able to perform a random sampling of their employee contributions. While better than doing nothing at all, this could leave the firm at risk.

There is a better way.

ComplySci offers clients a Political Contribution Validation service that compares your employees' pre-cleared and self-reported contributions against Federal, state and municipal contribution data. This service will also highlight any exceptions, including:

- Employees who made contributions but did not pre-clear or self-report them
- Employees who contributed more than was pre-cleared or self-reported
- Employees who did not make expected contributions

How Does It Work?

With a focus on accuracy and completeness of data, ComplySci offers an easy, automated process for firms to verify their employees' political contributions against actual governmental campaign contribution records. Our Campaign Contribution Database aggregates public Federal, state and municipal data, and has a 3-year rolling look-back to ensure that nothing slips through the cracks due to differences in reporting timeframes.

Validate Contributions Process:

1. Firm sends ComplySci an employee list and a list of approved preclearance requests or self-reported contributions.

2. ComplySci provides the firm with an exceptions report of any unmatched (government vs. employee reporting) data, including:

- Employees who made contributions that were not pre-cleared or reported
- Employees who contributed more than was pre-cleared or reported
- Employees who did not make the expected contributions

Verify Employee Contributions

For those firms that want to go one step further, ComplySci also offers the ability to run entire employee lists against our Campaign Contribution Database in order to identify all employee contributions - even if they were not pre-cleared or `self-reported.

Verify Contributions Process:

1. Firm sends ComplySci an employee list each quarter.

2. ComplySci compares the firm's employee list to its Campaign Contribution Database. ComplySci runs multiple queries in a methodical way to capture contributions made within or outside of the employee's home state, as well as to eliminate false positives.

3. ComplySci provides the firm with a quarterly report of all "matches" that verify the contributions made by employees. Clients can specify exactly what they want included in the output report.

For those Compliance teams that want to conduct individual searches, ComplySci also offers a Contribution lookup tool, which can be used to verify one-off employee contributions. Firms can also use the tool to run custom queries.

Why Use ComplySci for Monitoring Political Contributions?

As employees' interest and participation in the political process continues to grow, firms without a solid, scalable process in place run the risk of violating Pay-to-Play rules.

The ComplySci reporting and monitoring tools are designed to reduce firm's risks of violations by using automated national database queries to verify employees' compliance with your firm's and governmental contribution guidelines. By automating the process, you can be confident knowing all employee contribution activity is being verified, rather than relying on random sampling. The ComplySci process also removes the risk of human error inherent in manual verification processes. You don't need internal IT support to get started! Simply send ComplySci your firm's employee contribution data and/or employee list.

ComplySci's flexible queries and user-friendly output are designed to deliver the most accurate and complete results you can get, while reducing the time, aggravation and cost of complying with Pay-to-Play rules.