



Annual Report – Calendar Year 2025

Message from the Executive Director

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This Annual Report is prepared first and foremost for the Oklahoma Ethics Commissioners, whose constitutional responsibility for oversight and stewardship guides the agency's work. It is also intended to provide clear, accessible information to the public and to state leadership regarding the Commission's performance, priorities, and value to the State of Oklahoma.

Calendar Year 2025 was a consequential year for the Oklahoma Ethics Commission. Guided by the Commission's 2025–26 Strategic Plan, the agency advanced significant policy, operational, and education initiatives while navigating the complexities of modernizing a mission-critical technology system. Throughout the year, the Commission emphasized accuracy, fairness, and transparency—recognizing that public trust is strengthened not only by outcomes, but by the care taken in reaching them.

This report highlights measurable progress toward strategic goals, documents responsible use of public resources, and provides Commissioners with a clear record of decisions, milestones, and challenges encountered during the year. It also serves as a foundation for evaluating priorities and performance in 2026 and beyond.

Mission and Authority

The Oklahoma Ethics Commission is constitutionally established to ensure transparency, accountability, and integrity in Oklahoma government. The Commission administers and enforces ethics rules governing state officers and employees, and rules regarding campaigns for statewide offices, and local campaigns for the political subdivisions which includes school/technology center boards, counties and certain municipalities. The Commission also regulates lobbyist registration and reporting, and personal financial disclosures for political subdivision and state officers. The Commission provides guidance and education to those subject to its jurisdiction.

Strategic Framework (2025–26)

The Commission's work during Calendar Year 2025 aligned with three core strategic pillars adopted by the Commission:

1. **Promote Public Trust**
2. **Operational Efficiencies**
3. **Detect and Deter through Education and Compliance**

For Commissioners, this framework serves as the benchmark against which progress, resource allocation, and outcomes are evaluated. For external audiences, it provides a transparent explanation of how the Commission translates its constitutional mandate into measurable action.

This annual report makes public the agency's performance metrics and documents the value added to the State of Oklahoma.

Promote Public Trust

Annual Reporting and Transparency

- Establishment of this Annual Report as a standing accountability tool for Commissioners, the Legislature, and the public.
- Improved internal tracking of agency activities to support clearer reporting on outcomes and resource use.
- Continued fulfillment of public data and records requests during the Guardian 2.0 transition period.

Public Disclosure Policy

- Development of a uniform policy with clear criteria governing when complaints or investigations may be made public prior to final resolution.
- Policy framework balances transparency with due process, confidentiality requirements, and fairness to respondents.
- Commissioners were actively engaged in evaluating policy options and legal considerations.
- *Status (CY 2025): Development and final adoption complete.*

Advisory Group Formation

- Creation of an OEC Advisory Group to provide structured stakeholder input and routine feedback to the Commission.
- Members include candidates, officeholders, state officers, and state employees serving two-year terms.

- Quarterly meetings established to surface compliance challenges, system usability concerns, and training needs.
- First advisory meeting was held in November 2025, providing actionable recommendations directly informing Commission priorities.

Commission Value: - Improved stakeholder trust and communication - Earlier identification of emerging compliance issues - Informed decision-making grounded in real-world filer experience

Operational Efficiencies

Sequencing and System Dependencies

Several strategic initiatives adopted for the 2025–26 planning period were intentionally sequenced to align with system readiness and data reliability requirements. Certain initiatives—including implementation of risk-based audits, automated compliance tools, and expanded political subdivision integration—depend on accurate, complete, and stable data to ensure fair, consistent, and defensible outcomes.

During Calendar Year 2025, there were numerous delays in system readiness outside the Commission’s control. These delays made it imprudent to deploy automated or data-driven enforcement or audit processes, that would likely have produced inconsistent results or unintended compliance consequences.

In the interim, the Commission continued to fulfill its constitutional responsibilities through existing review, enforcement, and education processes while preparing for responsible implementation once system dependencies are resolved.

Risk-Based Filing Review and Audit Program

The Commission continued development of a risk-based filing review and audit framework intended to improve consistency, efficiency, and deterrence while minimizing unnecessary burden on filers.

Completed during CY 2025: - Identified audit objectives and policy principles emphasizing fairness, proportionality, and deterrence - Developed preliminary risk criteria for audit selection, including election outcomes and randomized review components - Evaluated integration of audit processes with complaint intake and enforcement workflows - Assessed data quality and system requirements necessary to support defensible audit selection.

Sequencing Decision: Full implementation of automated or data-driven audit selection was intentionally deferred due to system readiness issues outside the Commission’s control. Deploying a risk-based audit program without reliable and complete data would have risked inconsistent outcomes and undermined public confidence.

Diversion Program Development and Expansion

The Commission continued development of its diversion and corrective-action framework designed to promote education, timely correction, and future compliance, particularly for first-time or low-risk violations.

Completed during CY 2025: Refined eligibility criteria and policy objectives for diversion and corrective resolutions. Evaluated how diversion processes should align with enforcement priorities and filer fairness. Prepared record-keeping and outcome-tracking concepts to measure effectiveness

Sequencing Decision: Full-scale, automated implementation of diversion processes was sequenced to system readiness to ensure accurate tracking, consistent application, and reliable notification to affected filers.

Political Subdivision Compliance and Enforcement Integration

The Commission advanced planning for expanded inclusion of political subdivisions within its education, compliance, and enforcement framework.

Completed during CY 2025: Identified priority categories of political subdivisions for phased inclusion. Developed regional engagement and stakeholder outreach strategies. Prepared education and training concepts tailored to local officials and staff.

Sequencing Decision: Centralized reporting and enforcement integration for political subdivisions was sequenced to system readiness to ensure consistent treatment, accurate data capture, and effective compliance support.

Detect and Deter: Education and Compliance

Political Subdivision Inclusion Strategy

- Launch of a multi-year strategy to incorporate political subdivisions into Commission education, compliance, and enforcement activities.
- Prioritization of regional and local contacts to support a staggered rollout.
- Goal of 100% inclusion for execution of enforcement over a 1–3-year period, with measurable annual increases in compliance reporting.
- Advisory and marketing consultant group input informed training formats and sequencing.

Expanded Training and Public Guidance

- Significant expansion of education and guidance resources available to filers and the public.
- Development and publication planning for:
 - Recorded training presentations

- Expanded FAQs
- Public access to prior informal guidance responses
- A statewide schedule of in-person trainings
- *Initial resources released in CY 2025, with expanded offerings continuing into Spring 2026.*

Commission Value: Reduced unintentional violations - Improved filer understanding and confidence - Stronger compliance culture statewide.

Key Performance Indicators (Commission Oversight)

The following KPIs reflect **Commission governance and constitutional stewardship** during a period of significant system disruption, including the anticipated termination of the Guardian 2.0 vendor contract for breach. The KPIs intentionally measure **decisions, continuity, fairness, and risk management**, rather than vendor-dependent technical outcomes.

Commission Governance Scorecard – Calendar Year 2026

Strategic Area	KPI	Definition / Calculation	2026 Target
Accountability & Governance	Strategic Initiative Completion Rate	Number of strategic initiatives reaching a Commission-approved governance milestone ÷ total initiatives scheduled for the year	≥ 80%
Organizational Capacity & Stewardship	Operational Stability Index	(1) Annual staff turnover rate AND (2) budget variance from appropriation	Turnover ≤ 18%; budget variance within ±3%
Compliance, Oversight & Enforcement	Timely Intake of Complaints and Matters	Percentage of complaints and compliance matters triaged within 5 business days of receipt	≥ 90%
Compliance, Oversight & Enforcement	Corrective / Diversion Resolution Rate	Matters resolved through diversion or corrective action ÷ total matters resolved	45%–60%
Modernization & Continuity	System Continuity Assurance	Percentage of required constitutional functions maintained through interim systems or procedures	100% continuity
Public Trust, Education & Transparency	Education and Transition Support Output	Number of trainings, guidance releases, advisory meetings, and transition updates issued	≥ 18 outputs annually

Financial Stewardship and Internal Capacity

- Continued responsible management of appropriated funds.
- Emphasis on staff retention, cross-training, and operational continuity during system modernization.
- Strategic use of professional services to support technology transformation without long-term cost growth.

Looking Ahead to 2026

In 2026, the Commission will focus on consolidating gains made in 2025 while completing key strategic initiatives. Priorities include:

- Stabilize Guardian System for public usage and expand on reporting capabilities, including political subdivisions and school systems.
- Deployment of the case management system to enhance Commissioner oversight and data-driven decision-making.
- Continued expansion of political subdivision compliance and enforcement.
- Ongoing implementation and evaluation of diversion program outcomes and risk-based audit effectiveness.
- Continued emphasis on transparency through regular reporting and stakeholder engagement.

This Annual Report provides Commissioners with a clear record of progress, challenges, and outcomes from Calendar Year 2025 and serves as a foundation for strategic oversight and policy direction in the years ahead.

Prepared for the Oklahoma Ethics Commissioners and shared with the public and state leadership in support of transparency, accountability, and public trust.