

BOARD OF ELECTIONS
AUDIT OF BOARD OF ELECTIONS
OPERATIONS
AUGUST 2012



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

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August 10, 2012

Mr. Robert Kando, Executive Director
Rhode Island Board of Elections
50 Branch Avenue
Providence, RI 02904

Dear Executive Director Kando:

The Bureau of Audits has completed its audit of the Board of Elections operations which was initiated at your request on January 4, 2012. Our audit was conducted in accordance with Rhode Island General Laws §35-7-3. The findings and recommendations included herein have been discussed with you and the management staff at the Board of Elections, and we have considered all comments in the preparation of our report.

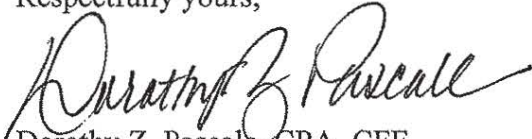
RIGL §35-7-3(b) entitled, "Audits performed by the bureau of audits," states that "Within twenty (20) days following the date of the issuance of the final audit report, the head of the department, agency or private entity audited shall respond in writing to each recommendation made in the final audit report..." Accordingly, management submitted its response to the audit findings and recommendations on August 3, and such response is included in this report. Pursuant to RIGL §35-7-3(b), the Bureau may follow up on recommendations included in our reports within one year following the date of issuance of the report.

We believe this is an opportune time to correct the deficiencies and build a stronger program. Our recommendations are designed to improve the stewardship of public resources, encourage stronger internal controls, and clarify responsibilities. More detailed information regarding our findings and recommendations is available in the "Findings, Recommendations, and Management's Response" section of this report.

Mr. Robert Kando
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We would like to express our appreciation to the officials, staff and vendors at the Board of Elections, the Secretary of State Elections Division, the Department of Health, Office of Vital Records, and the Department of Corrections for their willingness to work together to resolve the findings prior to the release of this report; and also for the cooperation extended to the members of our staff during the course of this review.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Dorothy Z. Pascale". The signature is fluid and cursive, with the first name "Dorothy" being more prominent and the last name "Pascale" following in a similar style.

Dorothy Z. Pascale, CPA, CFF
Deputy Chief, Bureau of Audits

c—Lorraine Hynes, Chief Purchasing Agent, Division of Purchases, Department of
Administration
Michael Narducci, Deputy Director, Office of Secretary of State
Robert Rock, Elections Assistant, Elections Division, Office of Secretary of State

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Audit Executive Summary

Why the Bureau Did This Review

The Bureau of Audits (Bureau) performed its audit of the Board of Elections at the request of the Executive Director of the Board of Elections. We did not audit or review the procedures and processes that are performed by the Secretary of State Elections Division and/or the local boards of canvassers.

Background Information

Pursuant to the State of Rhode Island General Law (RIGL) Title 17 et. seq., the Board of Elections (BOE) is responsible for implementing, monitoring, and enforcing federal and state laws as they apply to election and election-related activities, including campaign finances.

The BOE is administered by seven commissioners, known as the Board, and an executive director. The Board's mission is to protect the integrity of the electoral process and to effectively and efficiently administer the provisions of the election laws of the United States and the State of Rhode Island including, but not limited to, the governance and conduct of elections, voter registration, campaign finance, public funding of campaigns and any other duties prescribed by law¹. To achieve the Board's mission there are eleven (11) full-time positions, an executive director, and an annual budget of approximately \$1.95 million.

What the Bureau Found

Our audit resulted in the following findings:

- The continued use of current election equipment past 2015 without parts and service support increases the risk for equipment failure.
- The BOE and the Secretary of State Elections Division do not consistently or effectively communicate issues regarding voter register modifications or concerns.
- The Campaign Finance instructions for CF-1 "Notice of Organization Form" does not allow for the electronic submission of the form resulting in a duplication of effort.
- The communication and compliance with the State Vendor Affidavit filing requirements are weak (RIGL §17-27-2).
- The waived fine report is not generated or reviewed at regular intervals, nor is it reported to the Commissioners.

INTRODUCTION

Background

Purpose of the Board of Elections

Pursuant to the State of Rhode Island General Law Title 17 et. seq., the Board of Elections (BOE) has overall authority over all elections conducted in the state and is responsible for implementing, monitoring, and enforcing federal and state laws as they apply to election and election-related activities, including campaign finances. Additionally, the BOE adopts rules and regulations and issues fines and directives as it deems necessary to carry out the purpose and objectives of the election and campaign finance laws of Rhode Island.

The BOE is administered by seven commissioners, known as the Board, and an executive director. The Board's mission is to protect the integrity of the electoral process and to effectively and efficiently administer the provisions of the election laws of the United States and the State of Rhode Island including, but not limited to, the governance and conduct of elections, voter registration, campaign finance, public funding of campaigns and any other duties prescribed by law¹. To achieve the Board's mission there are eleven (11) full-time positions, an executive director, and an annual budget of approximately \$1.95 million.

The BOE consists of three units: Elections and Voter Registration Services, Campaign Finance, and Administrative Services. Below is a brief description of the responsibilities and staff for each division:

1. Elections and Voter Registration Services Division - is responsible for compliance with the laws and regulations regarding the electoral process which includes voter registration lists, poll worker training, polling procedures, ballot distribution, and election tabulation. The unit has five employees.
2. Campaign Finance Division - enforces the mandates of RIGL §17-25 et. seq., the Rhode Island Campaign Contribution and Expenditures Reporting Act, which includes overseeing, monitoring, and investigating the campaign finance activities of candidates, political action committees, political parties, and state vendors. The division has three employees.
3. Administration Division - is responsible for the day-to-day operations and the representation of the financial statements of the Board. Additionally, the administration division provides all accounting and human resource functions for the unit. There are three employees assigned to this unit.

¹ Board of Elections website.

Coordination with Secretary of State Elections Division and Local Boards of Canvassers

Since 2002, the BOE responsibilities have developed with the passage of the Help America Vote Act, which mandated upgrading many aspects of the election procedures, including voting machines, registration processes, and poll worker training. The BOE coordinates with the Secretary of State (SOS) Elections Division to share statewide oversight and implementation responsibility mandated by this act. By coordinating and sharing the responsibilities and oversight, there are proper segregation of duties and internal controls over this information. A summary of the coordination and segregation of duties follow:

- The SOS Elections Division manages the voter register via a software and database package known as the Central Voter Registry System (CVRS). The SOS uses the CVRS to produce the voter register modification reports; these reports are circulated to the local boards of canvassers for action and/or review.
- The local boards of canvassers validate and correct the voter register information for their specific jurisdiction and have the authority to make changes to the voter lists. However, in the event a municipality fails to update the list due to insufficient staffing, the Rhode Island general laws provides the State Board of Elections the authority to make changes to the voter list.
- The BOE has overall responsibility for all elections, including the conduct and oversight of the election process. The Board implements policies and procedures to ensure the accuracy of elections, including post-election audits.

Audit Objectives, Scope, and Methodology

The Bureau of Audits (Bureau), at the request of the Executive Director of the Board of Elections, conducted an audit of the process and procedures concerning the Board of Elections. We did not audit or review the electoral procedures and processes that are performed by the Secretary of State Elections Division and/or the local boards of canvassers. Our objectives were limited to audit and assess the efficiency of processes and controls over the BOE divisions listed below:

- Election and Voter Registration Services
 - Election process
 - Poll workers and Polling procedures
 - Voter Registration
 - Voting equipment

- Campaign Finance
 - Monitoring campaign donations and contribution limits
 - Matching funds
 - Vendor affidavits
 - Campaign reporting
- Administrative Services
 - Cash Receipts
 - Petty Cash Account

In addition to the above, the Bureau evaluated other current business policies and procedures, as deemed appropriate during the course of our audit testing, and assessed compliance with significant federal and state laws and regulations.

The Bureau discussed its findings and recommendations with the BOE Executive Director and SOS Elections Division management. The Bureau considered comments from each of the aforementioned parties in the preparation of this report; said responses to our recommendations are included in this report.

FINDINGS, RECOMMENDATIONS, AND MANAGEMENT'S RESPONSE

Election and Voter Registration Services – Risk of Equipment Failure due to Obsolescence

The U.S. Election Assistance Commission (EAC) issued guidelines to ensure best practices, security, and integrity over the entire voting process; these are known as the Election Management Guidelines (EMG). Chapter 17 of the EMG titled "Technology in Elections, Cost and Replacement" states in part:

... all technology has an expected lifespan and the cost of new technology, software upgrades, maintenance and replacement necessitates constant planning by election officials. It can be especially important to discuss long-term plans with budget authorities because voting systems will not last forever.

BOE is using voting equipment (OpTech III-P Eagle) purchased in 1998 that is beyond its useful life. This model, as well as the certified parts, has not been manufactured since 2008. BOE has a contract with Election Systems and Software for guaranteed parts and services which expires during FY 2015. The risk of equipment failure due to obsolescence is elevated when this current contract expires, since it is not known whether a "certified" source of parts and services will be available.

Finding 1: The voting equipment has exceeded its useful life. Also replacement parts are no longer manufactured. The continued use of this voting equipment without parts and service support increases the risk for equipment failure.

Recommendation: The BOE, in order to mitigate the risk of equipment obsolescence and non-compliance with EAC guidelines needs to obtain funding and deploy new voting equipment prior to 2015.

Board of Election Response:

Since the 2011 budget submission the Board has noted that the optical scan voting system is beyond its useful life and in need of replacement. The current service and maintenance contract terminates June 30, 2015. It is expected that the Board will publish a request for proposals 6 months prior to the termination of the contract, if the capital funding request is granted.

Election and Voter Registration Services – Updating the Voter Register

The SOS Elections Division receives information that affects the voter register from the Division of Motor Vehicles, the Department of Corrections (DOC), and the Department of Health (DOH). The SOS Elections Division is responsible to inform the local boards

of canvassers about this information which may require changes to the voter register. The local board of canvassers is responsible to validate this information and make the necessary changes to the voter register. The BOE has the overall responsibility regarding the accuracy of an election.

Incarcerated and Convicted Felons

RIGL § 17-9.2-3 Restoration of voting rights, requires

(d) The department of corrections shall, on or before the 15th day of each month, transmit to the secretary of state two (2) lists. The first shall contain the following information about persons convicted of a felony who, during the preceding period, have become ineligible to vote because of their incarceration; the second shall contain the following information about persons convicted of a felony who, during the preceding period, have become eligible to vote because of their discharge from incarceration...

(e) The secretary of state shall ensure that the statewide central voter registration is purged of the names of persons who are ineligible to vote because of their incarceration upon a felony conviction. The secretary of state shall likewise ensure that the names of persons who are eligible and registered to vote following their discharge from incarceration are added to the statewide central voter register in the same manner as all other names are added to that register.

The SOS Elections Division completed a system upgrade during the spring 2012. During our testing we noted that the voter register was not amended to account for convicted and incarcerated felons during the months of March and April 2012. The system upgrade process failed to include the incarceration file from DOC. The SOS and the BOE were not aware of the problem until June 7, 2012, when the Bureau brought this issue to their attention.

This matter has been rectified prior to the issuance of this report.

Deceased Voters

The SOS Elections Division has coordinated with the DOH to obtain the deceased persons records (a.k.a. vital record) on a weekly basis. A DOH vital records clerk manually enters the deceased records into the Vital Records system. Then, this information is systematically generated by DOH and transmitted to the SOS Elections Division. At the close of each calendar year, the DOH must perform another manual intervention (command script change) to change the program date (i.e., 2011 to 2012).

The DOH Office of Vital Records is behind with the data entry of deceased records; also, during the close of December 2011, there was an issue regarding the manual command script process. Therefore, deceased voters were not systematically removed from the

voter register for the period September 30, 2011, through June 11, 2012. The cause of this issue was not timely identified by DOH, and the BOE was not apprised of the issue.

The DOH corrected the command script error and is working towards entering all deceased records. Prior to the issuance of this report DOH has systematically generated the file. Information containing voters deceased since September 30, 2011, was sent to SOS Elections Division the week of June 11; this electronic file contained over 4,000 records. Additional testing confirmed the program is working as intended.

Finding 2: The SOS Elections Division and BOE do not consistently or effectively monitor or communicate issues regarding voter registration modifications or concerns.

Recommendation:

While the Bureau considers these to be isolated incidents, the monitoring of additions and deletions to the voter register by the BOE and SOS Elections Division recommended below will help to alert the agencies of any potential future issues and further strengthen controls.

- (a) The BOE should regularly monitor additions and deletions to the voter register by utilizing the existing National Voter Registration Act report. Monitoring this report will enable the BOE to be proactive in the detection or requirement of significant changes to the voter register, strengthen controls over the voter register, and track modifications to the voter register.
- (b) The SOS Elections Division should promptly communicate any issues or concerns regarding the voter register to the BOE.

Secretary of State Elections Division Response:

Secretary of State Mollis and the staff of his Elections Division have possessed a very close working relationship with the Board of Elections over the past five (5) plus years resulting in several successfully held elections. This working relationship includes daily communications with the Board of Elections and frequent office meetings to discuss outstanding issues. That being said, Secretary of State Mollis believes that the aforementioned two matters, pointed out by the Bureau of Audits, are exactly what the Bureau has characterized them as “isolated incidents” and do not reflect the normal working relationship of his Office and the Board of Elections.

With regard to the “Incarcerated and Convicted Felons Issue”, this issue resulted from an Information Technology glitch encountered while the Secretary of State’s Office was upgrading its CVRS system. The matter has been resolved and the Secretary of State expects the process to operate error free as it had for the years prior to this upgrade.

With regard to the "Deceased Voters" issue, the lack of receipt of a data file from the DOH was identified by the Secretary of State within days of not receiving its regularly scheduled weekly data on January 3, 2012. The Secretary of State was in constant communication with DOH from January 3, 2012, until it again started receiving data in June of 2012.

Board of Elections Response:

Prior to the issuance of the report the Board of Elections has assigned personnel to perform monthly reviews of reports generated by the Computer Voter Registration System and has scheduled bi-weekly meeting with the Secretary of State's Election Division.

Election and Voter Registration Services - Provisional Ballot Reconciliation

Provisional ballots are collected and qualified by the local boards of canvassers. The local boards send only the qualified ballots to the BOE to be included in the election count. The local boards of canvassers do not report the total number of provisional ballots received and the non-qualified ballots to the BOE. Currently there are no written procedures to require the BOE to reconcile the total provisional ballots received, the total non-qualified ballots received, and the total qualified ballots entered into the CVRS by the local boards of canvassers. The current format of the Elections Return Receipt form prepared by the local board of canvassers does not contain this information.

The BOE informally reconciles the CVRS to the qualified ballot information reported on the "Election Returns Receipt" by the local boards of canvassers. Any discrepancies are referred to and reconciled with the local board of canvassers. Any reconciliation procedures performed are not documented, or kept on file at BOE; rather, an informal reconciliation is performed and any discrepancies are corrected as necessary.

We noted during the April 24, 2012, primary, East Providence reported one qualified provisional ballot in the system; but zero provisional ballots were received by BOE, and the Election Return Receipt showed zero provisional ballots as transferred to BOE. After the BOE contacted the East Providence local board of canvassers, the data entry error was identified and corrected within the system.

Two internal control weaknesses exist in the current process:

- There is a lack of reconciliation of total provisional ballots and total non-qualified provisional ballots for each city and town; and
- there is a failure to require the reporting of the total provisional ballots and the non-qualified ballots on the Election Return Receipt form.

Finding 3: The BOE is not reconciling total provisional ballots and total non-qualified ballots received by the municipalities; the Election Return Receipt form does not require the municipality to report this information.

Recommendation: The Bureau recommends the BOE amend the Election Return Receipt form to include non-qualified ballots and total provisional ballot information. Also, the BOE should formally document the processes to reconcile this information. Additionally, BOE should retain records of the reconciliations performed for an amount of time deemed reasonable by management.

Board of Election Response:

The Board had identified the need to improve its provisional ballot reconciliation process in advance of the audit, and had implemented new procedures prior to the issuance of the report.

Election and Voter Registration Services - Boards of Canvassers coordination with the Board of Election

Though the Board has consistently required that the Local Boards of Canvassers attend training regarding the election proceedings before participating in an election, the policy lacks the authority of a regulation and has periodically resulted in less than full participation. Prior to each election the BOE offers a specialized seminar about the election proceedings especially for the local boards. Many do not attend this training which results in inefficient transmission of election results to BOE. Mandatory training for the local boards regarding the election proceedings, specifically transmitting of election results, will ensure a smoother election result tabulation process, and ensure election results are transmitted and recorded more timely.

Finding 4: Training for local boards of canvassers is not mandatory.

Recommendation: The Bureau recommends that Board of Elections promulgate a new regulation which requires all Boards of Canvassers to designate an employee and/or alternate to attend training held by the Board of Elections.

Board of Election Response:

The Board of Elections will begin the rules making process to require the designation of a Board of Canvassers employee or alternate to attend Board training classes.

Election and Voter Registration Services – Lack of Written Procedures Poll Worker Training

State law requires all poll workers to attend training. This policy is not formally documented nor are alternates required to attend training. This policy, along with the date of the training, is communicated via email to the local boards of canvassers prior to each election.

Currently, it is the responsibility of the cities and towns to train alternates for each election in case someone is unable to work as scheduled. The town of Jamestown did not train an alternate for the April 24, 2012, primary. Consequentially, a scheduled poll worker for the Jamestown precinct 1501 was unable to work as planned, resulting in an untrained poll worker employed during the April 24, 2012, primary.

Finding 5: The BOE has no written policy or procedure to require each local board of canvassers to send a minimum number of poll workers (including alternates) to training.

Recommendation: The Board of Elections should require each local board of canvassers send a minimum number of poll workers (including alternates) to training. Further, BOE should educate the Boards of Canvassers about the content of this policy.

Board of Election Response:

The Board has adopted procedures prior to the issuance of the report requiring that all poll workers attend training, plus an additional 10% as alternates, with a minimum of 2 alternates, which will be sent to each board of canvassers prior to the start of poll worker training.

Campaign Finance Division – Information Reporting

Notice of Organization – form CF-1

The instructions for form CF-1 clarify the filing requirements mandated within RIGL §17-25-8. The CF-1 must contain the name and address of the candidate, campaign treasurer and committee being established. The candidate must appoint one campaign treasurer before receiving any contributions or expending any money in furtherance or aid of their candidacy.

According to the instructions for the CF-1 form, an original Notice of Organization must be filed with the BOE and a notary signature must be on the form for it to be considered complete for initial and subsequent filings of this form. These instructions were developed prior to the Division's implementation of the Elections Report and Tracking System (ERTS).

The implementation of the ERTS allows a candidate to file subsequent CF-1 information electronically, but a notary signature is not possible. If a candidate files this subsequent form electronically, he/she must also file a notarized paper form to be in compliance. This results in duplicity of effort for both the candidate and Campaign Finance staff.

Finding 6: The Campaign Finance instructions for CF-1 "Notice of Organization Form" does not allow for the subsequent electronic submission of the form.

Recommendation: The Division should update their instructions to CF-1 "Notice of Organization Form" to allow the candidate to electronically file subsequent Notices of Organizations without notary signature.

Board of Election Responses:

The Board will amend its practice to allow candidates with active campaign finance accounts that file reports electronically, to also file CF-1 forms that are not notarized.

State Vendor Affidavits

RIGL §17-27-2 requires that state vendor affidavits be filed by vendors who have met the following requirements:

- Provided goods or services, whether written or unwritten, at a cost of \$5,000 or more; and
- during the 24 month period preceding the contract with the State, the vendor contributed an aggregate amount in excess of \$250 within a calendar year to any general officer, any candidate for general office, any member or candidate of the general assembly, or any political party.

RIGL §17-27-1(7) defines a "State vendor" to be:

(A) A person or business entity that sells goods or provides services to any state agency, (B) A person or business entity which has an ownership interest of ten (10%) percent or more in a business entity that sells goods or provides services to any state agency, or (C) A person who is an executive officer of a business entity that sells goods or provides services to any state agency, (D) The spouse or minor child of a person qualifying as a state vendor under the terms of subparagraphs (A), (B), or (C) of this paragraph, unless the spouse works for a vendor in competition for state business with the reporting business entity, or (E) A business of the business entity that is a parent or subsidiary of a business entity that sells goods or provides services to any state agency.

There are two divisions responsible for the enforcement of the above-stated law: the Department of Administration Division of Purchases (Purchasing), and the BOE Campaign Finance Division. Purchasing disseminates information to prospective state vendors and includes the affidavit information in its supplier packet but does not require the prospective vendor to acknowledge the requirement as part of its process to qualify bidders of state contracts. The Campaign Finance Division has the contribution information and the right to enforce the affidavit filings requirement. As of the date of our audit, these two entities did not share information to communicate and enforce RIGL §17-27-2.

Finding 7: Communication of the requirements, and compliance with RIGL §17-27-2 are weak.

Recommendation: The BOE should coordinate with Purchasing to identify and implement a process to effectively communicate the campaign finance state vendor definition according to RIGL §17-27-1(7) and to also require the acknowledgement of the affidavit filing requirement by the vendor during the bid certification process.

Board of Election Response:

The Board will work with the Purchasing Department to develop language for the purchasing bidder's certification process. This new procedure will require the vendor to acknowledge the rules and filing requirements.

DOA Division of Purchases Response:

The Division of Purchases will work with the Board of Elections to develop a process whereby the vendors are aware of the filing requirements during the bidder certification process.

Campaign Finance – Fines Waived for Good Cause

Pursuant to RIGL §17-25-11(g)(2), the Board of Elections assesses a fine of \$25 for candidates, PACs or political party committees who fail to file their reports timely. Reports may be filed electronically through the ERTS, in person at the Board of Elections, or by mail. The BOE will send a "Notice of Non-Compliance" via certified mail with return receipt to the candidate or officeholder, treasurer, or committees who fails to file their reports as required. The recipient has seven (7) days from the receipt of the "Notice" to pay the fine and file the required report, or an additional fine of two dollars per day will accrue.

According to RIGL §17-25-11(g)(2, 3), "the Board of Elections shall have the authority to waive late filing fines for good cause shown." The Rules and Regulations for the

appealing of late fines within the Campaign Finance Manual, states “Board of Elections hereby authorizes its Supervisory Staff to administratively review and act upon all requests, including setting conditions for any full or partial waivers, where the amount of fines and fees do not exceed five thousand dollars (\$5,000)...Nothing in this section shall prohibit the Board of Elections from acting on its own motion to waive any fines or fees imposed (p.71).”

The supervisory staff of the BOE have the authority to review and waive late filing fees that are less than \$5,000 for good cause in accordance with BOE regulations. We tested the data of waived fines and found no waived fines that exceed the authorized limit, and fines are waived in a consistent manner for all candidates. The ERTS has a waived fine report function; however, this report is not generated or reviewed by the Executive Director resulting in an internal control weakness.

Finding 8: The waived fine report is not generated or reviewed at a regular interval, nor is it reported to the Commissioners.

Recommendation: To encourage transparency and strengthen the controls over waived fines the Bureau recommends the Executive Director review the waived fine report on a predetermined basis and report it to the Commissioners at least annually.

Board of Election Response:

The Board will adopt the practice of preparing a report of waived fines to be presented to the Board on an at least annual basis.

Campaign Finance - Continuity of Operations and Lack of Written Policies and Procedures

The Campaign Finance Director has sole knowledge of the Division’s entire operation. Additionally, the Campaign Finance Director’s duties have not been trained amongst other staff. There are no written policies or procedures for the division, limiting specialized knowledge shared amongst employees. Documenting policies and procedures, and cross training employees, especially the Director’s duties, would improve operational knowledge and ensure greater business continuity.

Finding 9: There are no written standard operating policies and procedures for Campaign Finance.

Recommendation: Standard operating policies and procedures should be established and written. These should then be formally communicated to the staff. Further, the BOE should develop a cross training strategy to assure continuity of operations.

Board of Election Response:

The Campaign Finance Director will develop written policies and procedures that are communicated to the staff and begin a cross-training program to assure the continuity of operations.

Administrative Services – Depositing Campaign Finance Cash Receipts

The Campaign Finance Division receives payments of fines and penalties. It is required to follow RIGL §11-28-1 which states, “Every officer or other person receiving or have in his or her hands money belonging to the state that should be paid into the state treasury, shall pay that money to the general treasurer within seven (7) business days after he or she shall receive it or at any other times that may be deemed necessary by the general treasurer.”

The confidential secretary at BOE is responsible for making the deposit. The deposit is made on an ad-hoc basis. A random sample of deposits was tested for compliance with RIGL §11-28-1. Instances were found where checks were in the possession of Campaign Finance for more than seven days before they were deposited.

Finding 10: BOE does not consistently comply with the seven-day deposit rule (RIGL §11-28-1).

Recommendation: BOE should determine and implement a schedule (at least weekly) to deposit monies received and ensure compliance with RIGL §11-28-1.

Board of Election Response:

Prior to the issuance of the report the Board has adopted the practice of depositing money received within the 7 day statutory requirement that requires the campaign finance director to review deposits on a weekly basis with the administrative assistant.