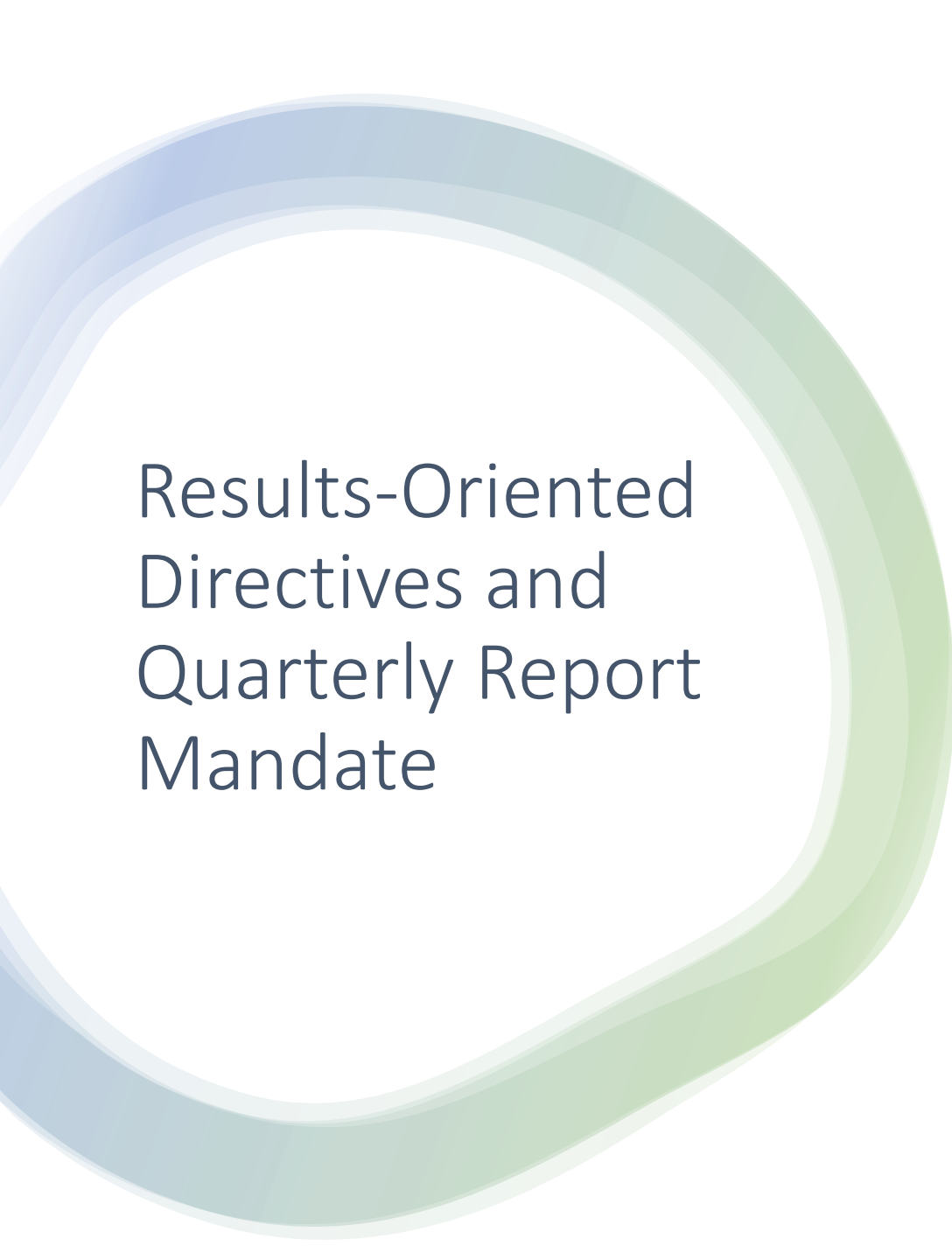


# Policy Directives Quarterly Progress Report

September 21, 2023

James M. Lindsay, Chief of Enforcement

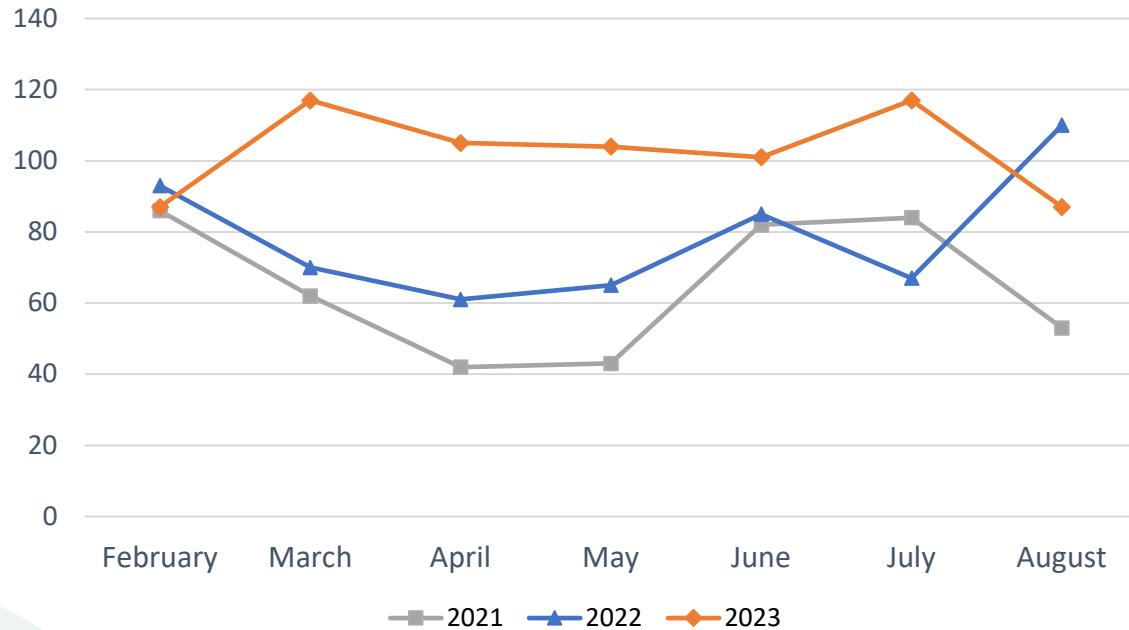


# Results-Oriented Directives and Quarterly Report Mandate

- Commission has issued three result-oriented directives to Enforcement Chief
  - Take all appropriate actions within Chief discretion to reduce by 75% the number of open cases existing prior to 1/1/23 as quickly as possible and no later than 12/31/24 (Sec I.A.)
  - Identify and implement such policies and procedures as are necessary to ensure that, for the foreseeable future, the annual number of carryover cases does not exceed 625 (Sec I. B.)
  - Establish and maintain a system for the efficient allocation and completion of Enforcement Division workload consistent with policy to resolve cases within two years (Sec II. B. )
- Enforcement Chief to provide quarterly reports to Commission on achieving goals stated in Section I (Sec I. C.)

# Case Closures Comparison Data

Cases Closed by Month, 2021-2023

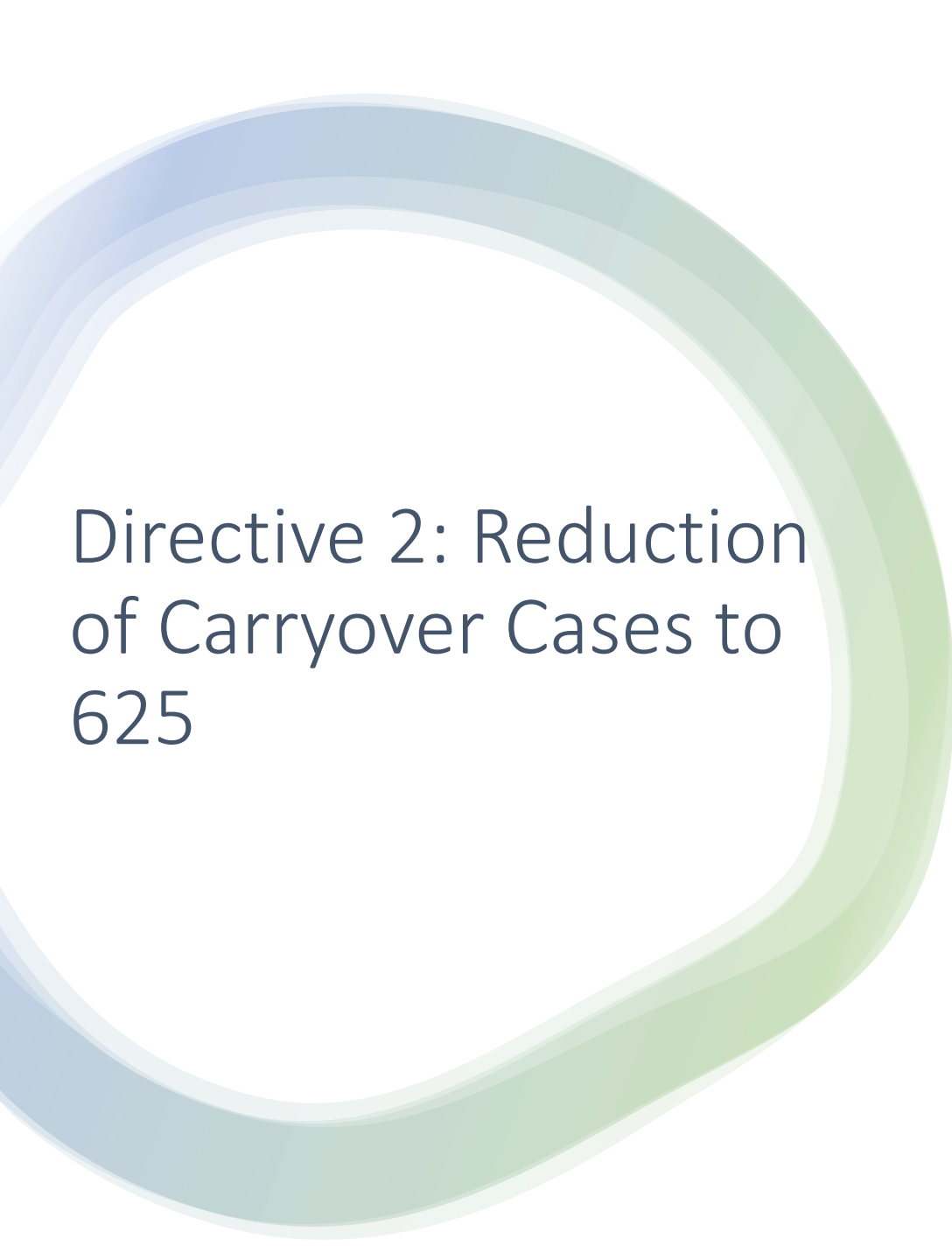


- Case Closure Data Graph  
Comparing case closures over similar period from 2021-2023
  - Substantially higher number of closures in 2023
  - More consistent level of monthly closures in 2023
  - Data shows consistency of focus on case closure since effective date of the Policy Directives

# Directive 1: 75% Reduction of Pre-2023 Cases

- Baseline: 1,415 cases on December 31, 2022
- Today: 924 Pre-2023 Cases
- Closed in 2023: 491 Pre-2023 cases for 35% reduction
  - Focus on 2016-2019 cases where roughly 50% reduction achieved
- Closures needed to achieve 75% reduction: 570
- Slightly under pace, but Enforcement is hopeful the directive can be achieved by December 31, 2024

Year	# of Cases as of January 1, 2023	# of Cases as of August 31, 2023	Difference in Caseload for 2016-2022 Cases
2016	3	0	-3
2017	5	2	-3
2018	89	48	-41
2019	195	92	-103
2020	301	206	-95
2021	382	259	-123
2022	440	317	-123
Total			-491



## Directive 2: Reduction of Carryover Cases to 625

- Baseline: 1,415 carryover cases on December 31, 2022
- Today: 1,191 cases – Reduction of 224 open cases
  - Clear progress but farther to go on this directive
  - Focus on 2016-2019 cases
  - Focus on resolution of matters involving inadvertent and minor violations
- The road to 625
  - Short-term goal: 1,000 carryover cases at end of 2023
  - Long-term goal: achieved by end of 2025
  - Impediments to long-term goal are election year and likely greater incremental difficulty in resolving currently unresolved cases

## Directive 3: 2-Year Case Lifecycle

- Although a result-oriented directive, this directive is contained within Section II of the Policy Directives regarding internal policies and procedures and separate biannual reporting to the Commission
- Initial biannual report to occur in January
  - Data insufficient to assess progress currently
  - January 2024 biannual report will include a four-year comparison of data concerning the following:
    - ❖ Total number of complaints/referrals received, cases/investigations opened, cases/investigations closed, and cases referred to other agencies
    - ❖ Average monthly rate of cases/investigations opened and closed for each class of Enforcement staff
    - ❖ Detailed explanation for any differences in Enforcement Division performance during the reporting period compared with the prior years' data
- Focus continues to be on case reduction directives as case reduction will naturally affect the lifecycle going forward

- Continued focus on resolving or moving older cases forward
- Intake Process Refinements
  - Full-time Assistant Chief
  - Increased effectiveness in 3-day and 14-day timeframes
  - Turning verbal process refinements into written guidelines
- Additional personnel starting in September/October
  - Intake: SSA and Attorney
  - Prosecutions: 2 Attorneys



Looking Forward