

COVINGTON

State Lobbyist and Campaign Finance Filing Changes Related to COVID-19

April 29, 2020

Election and Political Law

As states grapple with the effects of the COVID-19 crisis, many have opted to make changes to campaign finance and lobbying reporting due dates and filing procedures. Covington has assembled the below chart of changes to state campaign finance and lobbying filing schedules that states have announced as of last week. In addition to these changes, some states have filing deadlines that are based on changed election dates or legislative session dates, such as pre-election campaign reports or biweekly lobbying reports due during the legislative session. Because election and session dates are in constant flux, those changes are not reflected below, but filers should consider whether election and session dates have changed in their states and what that means for filing deadlines.

Many organizations are finding themselves in uncharted territory because of the crisis and interacting frequently with state officials. Organizations should consult our guidance on [interacting with state officials](#) in the pandemic and on [donating funds, goods, and services to government](#) during the pandemic for more information on related compliance issues.

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Jurisdiction	Filing Type	Regulator	Website for Alerts	Filing Status
Alabama	Campaign Finance	Secretary of State	https://www.sos.alabama.gov/newsroom/	No guidance available at this time.
	Lobbying	Ethics Commission	http://ethics.alabama.gov/news.aspx	No guidance available at this time.

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Alaska	Campaign Finance	Public Offices Commission	https://doa.alaska.gov/apoc/home.html	No guidance available at this time.
	Lobbying	Public Offices Commission	https://doa.alaska.gov/apoc/FilerResources/lobbyistCalendar.html	No guidance available at this time.
Arizona	Campaign Finance	Secretary of State	https://azsos.gov/about-office/media-center/press-releases	Filing deadlines are unchanged. No specific announcements have been made about campaign finance or lobbying reporting requirements.
	Lobbying	Secretary of State	https://azsos.gov/about-office/media-center/press-releases	No guidance available at this time.
Arkansas	Campaign Finance	Secretary of State; Ethics Commission	https://www.sos.arkansas.gov/news/	No guidance available at this time.
	Lobbying	Secretary of State; Ethics Commission	https://www.sos.arkansas.gov/news/	No guidance available at this time.
California	Campaign Finance	Fair Political Practices Commission	http://www.fppc.ca.gov/media/press-releases/2020-news-releases.html	Filing deadlines are unchanged. Paper statements with live signatures are still required if feasible. If filers make their best efforts to file on time but cannot because of the pandemic, the FPPC will consider this a strong factor mitigating against enforcement. Filers should document the problems they face with timely filing.

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	Lobbying	Fair Political Practices Commission	http://www.fppc.ca.gov/mediapress-releases/2020-news-releases.html	Filing deadlines are unchanged. Paper statements with live signatures are still required if feasible. If filers make their best efforts to file on time but cannot because of the pandemic, the FPPC will consider this a strong factor mitigating against enforcement. Filers should document the problems they face with timely filing.
Colorado	Campaign Finance	Secretary of State	https://www.sos.state.co.us/pubs/elections/CampaignFinance/news/current.html	Filing deadlines are unchanged. Filings that must be made on paper should be mailed by United States Postal Service as other forms of mail may not be timely received.
	Lobbying	Secretary of State	https://www.sos.state.co.us/pubs/lobby/lobby_home.html	No deadline guidance available at this time. Filings that must be made on paper should be mailed by United States Postal Service as other forms of mail may not be timely received.
Connecticut	Campaign Finance	State Election Enforcement Commission	https://portal.ct.gov/seec	Filing deadlines are unchanged. The next deadline is April 13, 2020. However, the Commission is suspending all fees and penalties for candidate committees, political committees and party committees that are up to 90 days late in submitting filings.
	Lobbying	Office of State Ethics	https://portal.ct.gov/Ethics/Lobbyist-Filings/Lobbyist-Filings/Lobbyist-Main-Page	Filing deadlines remain unchanged. However, the Office of State Ethics has granted a 30-day grace period to any lobbyist not able to meet the April 10, 2020 deadline. The Office will adjust the directive, if necessary.

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Delaware	Campaign Finance	State Election Commissioner	https://cfrs.elections.delaware.gov/Home/	No guidance available at this time.
	Lobbying	Public Integrity Commission	https://depic.delaware.gov/	No guidance available at this time.
District of Columbia	Campaign Finance	Office of Campaign Finance	https://ocf.dc.gov/	Filing deadlines are unchanged.
	Lobbying	Board of Ethics and Government Accountability	https://bega.dc.gov/	Filing deadlines remain unchanged. However, late fees will not be assessed for filings that are delayed due to COVID-19. Filers who will be unable to meet a registration or reporting deadline are encouraged to contact the Board in advance.
Florida	Campaign Finance	Department of State, Division of Elections	https://dos.myflorida.com/elections/	No guidance available at this time.
	Lobbying	Commission on Ethics; Lobbyist Registration Office	http://www.ethics.state.fl.us/index.aspx ; https://www.floridalobbyist.gov/	No guidance available at this time.
Georgia	Campaign Finance	Transparency and Campaign Finance Commission	http://ethics.ga.gov/	Filing deadlines remain unchanged. All filings must be made electronically.
	Lobbying	Transparency and Campaign Finance Commission	http://ethics.ga.gov/	Filing deadlines remain unchanged. All filings must be made electronically.
Hawaii	Campaign Finance	State Ethics Commission; Campaign Spending Commission	https://ethics.hawaii.gov/ ; http://ags.hawaii.gov/campaign/main/coronavirus-update/	Filing deadlines are unchanged.

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	Lobbying	State Ethics Commission	https://ethics.hawaii.gov/	The deadline for the March 31, 2020 filing deadline has been extended to April 30, 2020. The Executive Director may extend this deadline until May 31, 2020 without further Order of the Commission.
Idaho	Campaign Finance	Secretary of State	https://sos.idaho.gov/corona-virus/	Filing deadlines remain unchanged. If documents must be dropped off in person, filers must call (208) 332-2814 or (208) 334-2852 to schedule a time.
	Lobbying	Secretary of State	https://sos.idaho.gov/corona-virus/	Filing deadlines remain unchanged. If documents must be dropped off in person, filers must call (208) 332-2814 or (208) 334-2852 to schedule a time.
Illinois	Campaign Finance	State Board of Elections	https://www.elections.il.gov/Main/NewsDetail.aspx	No guidance available at this time.
	Lobbying	Secretary of State	https://www.cyberdriveillinois.com/news/home.html	No guidance available at this time.
Indiana	Campaign Finance	Secretary of State	https://www.in.gov/sos/elections/2394.htm	All deadlines associated with the 2020 primary election have been extended 28 days.
	Lobbying	Lobby Registration Commission; Department of Administration	https://www.in.gov/ilrc/ https://www.in.gov/idoa/2471.htm	ILRC (legislative lobbying) first period activity reports deadline extended to July 15, 2020. No guidance for IDOA (executive lobbying) reports available at this time.
Iowa	Campaign Finance	Ethics and Campaign Disclosure Board	https://ethics.iowa.gov/	Filing deadlines remain unchanged. Filers should contact the Board immediately if they anticipate difficulties meeting the deadline. Late filings attributable to the COVID-19 health crisis will be addressed on a case-by-case basis.

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	Lobbying	Ethics and Campaign Disclosure Board	https://ethics.iowa.gov/	Filing deadlines remain unchanged. Filers should contact the Board immediately if they anticipate difficulties meeting the deadline. Late filings attributable to the COVID-19 health crisis will be addressed on a case-by-case basis.
Kansas	Campaign Finance	Secretary of State	https://sos.kansas.gov/	No guidance available at this time.
	Lobbying	Secretary of State	https://sos.kansas.gov/	No guidance available at this time.
Kentucky	Campaign Finance	Registry of Election Finance	https://kref.ky.gov/Pages/default.aspx	As the primary was moved to June 23, 2020, the primary pre-election report is now due May 27, 2020. Deadlines for quarterly reports remain unchanged.
	Lobbying	Executive Branch Ethics Commission; Legislative Ethics Commission	https://ethics.ky.gov/lobbying/Pages/default.aspx ; https://klec.ky.gov/Pages/default.aspx	LEC (legislative lobbying) filing deadlines remain unchanged. Filers who traditionally submit paper documents may contact the Commission for access to the electronic filing system. Paperwork may also be emailed or faxed to the office. No guidance for EBEC (executive lobbying) reports available at this time.
Louisiana	Campaign Finance	Ethics Administration Program	http://ethics.la.gov/CampFinanHome.aspx	All deadlines associated with the 2020 primary and general election have been rescheduled. The new filing schedule is available here: http://ethics.la.gov/Pub/CampFinan/Sched/20200620.pdf
	Lobbying	Ethics Administration Program	http://ethics.la.gov/LobbyingHome.aspx	Filing deadlines remain unchanged.
Maine	Campaign Finance	Commission on Governmental Ethics and Election Practices	https://www.maine.gov/ethics/home	No guidance available at this time.

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	Lobbying	Commission on Governmental Ethics and Election Practices	https://www.maine.gov/ethics/home	No guidance available at this time.
Maryland	Campaign Finance	State Board of Elections	https://elections.maryland.gov/index.html	No guidance available at this time.
	Lobbying	State Ethics Commission	https://ethics.maryland.gov/lobbyists/	No guidance available at this time.
Massachusetts	Campaign Finance	Office of Campaign and Political Finance	https://www.ocpf.us/	No guidance available at this time.
	Lobbying	Secretary of the Commonwealth	https://www.sec.state.ma.us/lob/lobidx.htm	No guidance available at this time.
Michigan	Campaign Finance	Secretary of State	https://www.michigan.gov/sos/0,4670,7-127-1633_8723--,00.html	Filing deadlines remain unchanged.
	Lobbying	Secretary of State	https://www.michigan.gov/sos/0,4670,7-127-1633_11945--,00.html	Filing deadlines remain unchanged.
Minnesota	Campaign Finance	Campaign Finance Board	https://cfb.mn.gov/	No guidance available at this time.
	Lobbying	Campaign Finance Board	https://cfb.mn.gov/	No guidance available at this time.
Mississippi	Campaign Finance	Secretary of State	https://www.sos.ms.gov/elections-voting/pages/campaign-finance-lobbying.aspx	No guidance available at this time.

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	Lobbying	Secretary of State	https://www.sos.ms.gov/elections-voting/pages/campaign-finance-lobbying.aspx	No guidance available at this time.
Missouri	Campaign Finance	Ethics Commission	https://www.mec.mo.gov/	Filing deadlines remain unchanged.
	Lobbying	Ethics Commission	https://www.mec.mo.gov/MEC/Lobbying/Home.aspx	Filing deadlines remain unchanged.
Montana	Campaign Finance	Commissioner of Political Practices	https://politicalpractices.mt.gov/campaignfinance	No guidance available at this time.
	Lobbying	Commissioner of Political Practices	http://politicalpractices.mt.gov/lobbying	No guidance available at this time.
Nebraska	Campaign Finance	Accountability and Disclosure Commission	https://nadc.nebraska.gov/cf/index.html	No guidance available at this time.
	Lobbying	Accountability and Disclosure Commission	https://nadc.nebraska.gov/li/index.html	No guidance available at this time.
Nevada	Campaign Finance	Secretary of State	https://www.nvsos.gov/sos/elections/candidate-information/campaign-finance-reporting-requirements	No guidance available at this time.
	Lobbying	Director of the Legislative Counsel Bureau	https://www.leg.state.nv.us/Lobbyist/?SessionString=80th2019	No guidance available at this time.

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New Hampshire	Campaign Finance	Secretary of State	https://sos.nh.gov/CampFin.aspx	No guidance available at this time.
	Lobbying	Secretary of State	https://sos.nh.gov/lobby.aspx	No guidance available at this time.
New Jersey	Campaign Finance	Election Law Enforcement Commission	https://www.elec.nj.gov/	A revised filing schedule corresponding with rescheduled elections is available at https://www.elec.nj.gov/forcandidates/dates_CV2020.htm . A grace period for late filings may be available if sufficient information is provided.
	Lobbying	Election Law Enforcement Commission	https://www.elec.nj.gov/	No guidance available at this time.
New Mexico	Campaign Finance	Secretary of State	https://www.sos.state.nm.us/candidate-and-campaigns/	No guidance available at this time.
	Lobbying	Secretary of State	https://www.sos.state.nm.us/legislation-and-lobbying/	In-person filings are no longer accepted.
New York	Campaign Finance	State Board of Elections	https://www.elections.ny.gov/INDEX.html	Filing deadlines associated with the postponed presidential primary election have been rescheduled. The new filing schedule can be accessed from: https://www.elections.ny.gov/INDEX.html
	Lobbying	Joint Commission on Public Ethics	https://jcope.ny.gov/	Hand delivery of lobbying filings will be accepted starting April 15, 2020. However, no checks will be accepted in person until further notice. The audit program has also been suspended until further notice.

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North Carolina	Campaign Finance	State Board of Elections	https://www.ncsbe.gov/Campaign-Finance	No guidance available at this time.
	Lobbying	Secretary of State	https://www.sosnc.gov/divisions/lobbying	The penalty for failing to file first quarter lobbyist reports by April 22, 2020 will be waived so long as 1) they are submitted by July 22, 2020; 2) they are accompanied by an attached statement that they could not be notarized on time due to social distancing requirements; and 3) all reports due July 22, 2020 are deemed timely filed.
North Dakota	Campaign Finance	Secretary of State	https://vip.sos.nd.gov/Portal/istDetails.aspx?ptlhPKID=116&ptlPKID=2	No guidance available at this time.
	Lobbying	Secretary of State	https://sos.nd.gov/lobbyists	No guidance available at this time.
Ohio	Campaign Finance	Secretary of State	https://www.ohiosos.gov/campaign-finance/deadline-calendars/	Changed deadlines are available at: https://www.ohiosos.gov/globalassets/candidates/2020calendar.pdf
	Lobbying	Joint Legislative Ethics Commission	http://www.jlec-olig.state.oh.us/?page_id=4	No guidance available at this time.
Oklahoma	Campaign Finance	Ethics Commission	https://www.ok.gov/ethics/	No guidance available at this time.
	Lobbying	Ethics Commission	https://www.ok.gov/ethics/	No guidance available at this time.
Oregon	Campaign Finance	Secretary of State Elections Division	https://sos.oregon.gov/voting-elections/Pages/default.aspx	Filing deadlines remain unchanged.

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	Lobbying	Ethics Commission	https://www.oregon.gov/ogec/Pages/index.aspx	No guidance available at this time.
Pennsylvania	Campaign Finance	Department of State	https://www.dos.pa.gov/VotingElections/CandidatesCommittees/CampaignFinance/Pages/default.aspx	The notarization requirement is waived for some reports. Paper filers may file via email.
	Lobbying	Department of State	https://www.dos.pa.gov/OtherServices/LobbyingDisclosure/Pages/default.aspx	The first quarter lobbyist report date is extended to July 30, 2020. The second quarter report remains due on July 30, 2020.
Rhode Island	Campaign Finance	Board of Elections	https://elections.ri.gov/	No guidance available at this time.
	Lobbying	Department of State	https://www.ri.gov/press/view/37922	Filing deadlines remain unchanged.
South Carolina	Campaign Finance	State Ethics Commission	https://ethics.sc.gov/	No guidance available at this time.
	Lobbying	State Ethics Commission	https://ethics.sc.gov/	No guidance available at this time.
South Dakota	Campaign Finance	Secretary of State	https://sdsos.gov/elections-voting/upcoming-elections/general-information/Covid-19ElectionInformation.aspx	No guidance available at this time.
	Lobbying	Secretary of State	https://sosenterprise.sd.gov/businessservices/lobbyist/default.aspx	No guidance available at this time.

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Tennessee	Campaign Finance	Bureau of Ethics and Campaign Finance	https://www.tn.gov/content/tn/tref.html	Filing deadlines remain unchanged.
	Lobbying	Bureau of Ethics and Campaign Finance	https://www.tn.gov/content/tn/tec/tec-lobbyist.html	No guidance available at this time.
Texas	Campaign Finance	Ethics Commission	https://www.ethics.state.tx.us/	Filing deadlines remain unchanged.
	Lobbying	Ethics Commission	https://www.ethics.state.tx.us/	Filing deadlines remain unchanged.
Utah	Campaign Finance	Office of the Lieutenant Governor	https://disclosures.utah.gov/	No guidance available at this time.
	Lobbying	Office of the Lieutenant Governor	https://lobbyist.utah.gov/	No guidance available at this time.
Vermont	Campaign Finance	Secretary of State	https://sos.vermont.gov/elections/about/covid-19-response/	No guidance available at this time.
	Lobbying	Secretary of State	https://lobbying.vermont.gov/	Filing deadlines remain unchanged.
Virginia	Campaign Finance	Department of Elections	https://www.elections.virginia.gov/index.html	No guidance available at this time.
	Lobbying	Conflict of Interest and Ethics Advisory Council	http://ethics.dls.virginia.gov/index.asp	No guidance available at this time.

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Washington	Campaign Finance	Public Disclosure Commission	https://www.pdc.wa.gov/engage/news/tips-filing-during-covid-19-emergency	Filing deadlines remain the same and filings should be made online. Filers should let the PDC know if extenuating circumstances related to COVID-19 delay their filings. While offices are closed, mailed contributions are not actually "received" until a person actually takes possession the contribution. Reports normally submitted by mail can be sent as an attachment to an email and signed with an electronic signature.
	Lobbying	Public Disclosure Commission	https://www.pdc.wa.gov/engage/news/tips-filing-during-covid-19-emergency	Filing deadlines remain the same and filings should be made online. Filers should let the PDC know if extenuating circumstances related to COVID-19 delay their filings. While offices are closed, mailed contributions are not actually "received" until a person actually takes possession the contribution. Reports normally submitted by mail can be sent as an attachment to an email and signed with an electronic signature.
West Virginia	Campaign Finance	Secretary of State	https://sos.wv.gov/elections/Pages/default.aspx	On April 3, 2020, the Secretary of State's Office posted updated campaign finance filing deadlines in light of the rescheduled election. They can be found at: https://sos.wv.gov/FormSearch/Elections/Informational/Campaign%20Finance%20Deadlines.pdf
	Lobbying	Ethics Commission	https://ethics.wv.gov/Pages/default.aspx	No guidance available at this time.
Wisconsin	Campaign Finance	Ethics Commission	https://ethics.wi.gov/pages/home.aspx	Filing deadlines remain unchanged.
	Lobbying	Ethics Commission	https://ethics.wi.gov/pages/home.aspx	Filing deadlines remain unchanged.

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Wyoming	Campaign Finance	Secretary of State	http://soswy.state.wy.us/Elections/Default.aspx	No guidance available at this time.
	Lobbying	Secretary of State	http://soswy.state.wy.us/Elections/Default.aspx	No guidance available at this time.

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If you have any questions concerning the material discussed in this client alert, please contact the following members of our Election and Political Law practice:

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