



**Testimony of Sheila Krumholz, Executive Director of the Center for Responsive Politics
to the House Committee on Appropriations Legislative Branch Subcommittee
re: Improving Lobbyist Tracking Data**

March 29, 2019

Chairman Ryan, Ranking Member Herrera Beutler, and members of the committee, thank you for the opportunity to submit testimony on a simple way the House of Representatives can improve the transparency of lobbyist disclosures.

I am executive director of the Center for Responsive Politics, a nonpartisan, nonprofit research organization based here in Washington that monitors and analyzes campaign contributions in federal elections, lobbying, and other forms of money and elite influence in U.S. politics and policy.

The Clerk of the House and Secretary of the Senate serve as the repositories for over twenty years of data detailing the lobbying activities of thousands of organizations that are required to file under rules set forth by the Lobbying Disclosure Act of 1995 (LDA) and Honest Leadership & Open Government Act of 2007 (HLOGA). These reports serve as the basis for important public resources that allow investigations by academics, journalists and Congress itself that contribute to the integrity of policy making processes.

Annually, these reports list more than 11,000 individual lobbyists as having undertaken significant "lobbying activities."¹ The Center for Responsive Politics (CRP) and others rely on this data both to populate the OpenSecrets.org website, which is free and open to the public, as well as to provide additional research assistance for journalists, nonprofits, academic institutions and interested citizens.

This work includes normalizing individual lobbyist names to facilitate tracking their employment history and political campaign contributions. There is currently no publicly available identifier that makes clear that names reported as "Jane Davis," "Jane A. Davis," and "Jane Ann Davis" all refer to the same individual lobbyist. In fact, our research finds that over the last twenty years, an average of 12 percent of names reported annually are extraneous variations due to typographical

¹ Lobbying Disclosure Act Guidance, Revised January 31, 2017;
https://lobbyingdisclosure.house.gov/amended_lda_guide.html#section4

errors, nicknames, and name changes. Recent years have been consistently in the eight percent range. Despite this recent improvement, considerable labor is expended reconciling the different versions as well as verifying that individuals with similar or common names are in fact, different people. Changes to a lobbyist's legal name based on changed marital status are common and present further challenges as there is often not an easily accessible way to confirm that “Jane Doe” and “Jane Buck” are, in fact, the same person.

Considerable effort goes toward creating and maintaining a version of lobbyist IDs through algorithmic matching as well as human review. Following a quarterly filing deadline, a full day is spent reconciling variations caused by typos, nicknames, name changes due to marriage and changes in associated registrants, delaying the release of an improved data set.

Based on official filing manuals,² the Clerk of the House and Secretary of the Senate assign a unique identifier to each lobbyist during the filing process that is used to track each person across reports (e.g., between LD-1 to LD-2; across various registrants; and in the LD-203 contribution reports). However, publicly released downloadable data does not include unique IDs. The existing non-public identifiers that are used to login can easily and programmatically be used to produce ones that are safe to disclose.

The Honest Leadership & Open Government Act’s revolving door provisions make it clear that Congress believes that tracking registered lobbyists’ employment across government and the private sector is essential to monitor for conflicts of interest and to protect the integrity of the federal government. The recently released Government Accountability Office annual review of LDA compliance found that 19 percent of 2018³ reports failed to fully comply with requirements to disclose previous government employment as required, up from 15 percent in 2017⁴. The ability to easily and accurately identify individuals throughout their lobbying careers is integral to research and oversight by civil society actors that fill that compliance gap.

We respectfully request the addition of unique identifiers for individual lobbyists that are currently available only internally to the offices of the Clerk of the House and Secretary of the Senate to the publicly available data files that are updated daily. If the addition of such identifiers is not possible at this time, we request that a study be undertaken to determine the feasibility of doing so in the future.

² “Employed lobbyists are assigned a unique ID when they are registered with the House and Senate to lobby and added to the Contribution Reporting System by the person in your organization who manages the registration and reporting filings.” – From the LD-203 “Help” manual for filers:
<https://lda.congress.gov/LC/help/default.htm?url=WordDocuments%2Faccessingthesystem.htm>

³ “GAO 2018 Lobbying Disclosure: Observations on Lobbyists’ Compliance with Disclosure Requirements,” March 2019:
<https://www.gao.gov/assets/700/698103.pdf>

⁴ “GAO 2017 Lobbying Disclosure: Observations on Lobbyists’ Compliance with Disclosure Requirements,” March 2018:
<https://www.gao.gov/assets/700/690988.pdf>

Thank you for the opportunity to provide our comments. We welcome the chance to discuss them further or answer any questions the Committee may have. Please feel free to contact me at skrumholz@crp.org.

Sheila Krumholz

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Sheila Krumholz is the executive director of the Center for Responsive Politics, a nonpartisan watchdog group that tracks money in politics. Ms. Krumholz became Executive Director in 2006, prior to which she was CRP's research director for eight years. As research director, she supervised data and analysis published on CRP's website, OpenSecrets.org, and research for investigative journalists and CRP's partners and clients in the media, academia and elsewhere.

Ms. Krumholz has testified before Congress and the Federal Election Commission on issues related to government transparency and accountability, and is cited frequently in prominent national news outlets. She regularly makes presentations to citizen's groups, scholars, government officials, NGOs that conduct research and advocacy, and at meetings of professional news organizations. She has a degree in international relations and political science from the University of Minnesota.