★ VIRGINIA ★
DEPARTMENT *of* ELECTIONS

Report on the Plan to Replace the Campaign Finance Systems

Options to Replace COMET, CFM, and CFR

October 1, 2025

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Introduction

Purpose:

The Department of Elections (ELECT) was formed in 2014 to conduct the State Board of Election's administrative and programmatic operations and other duties consistent with its delegated authority.

Chapter 725 of the 2025 Acts of Assembly directed the Virginia Department of Elections (ELECT) to provide a report to the Governor and the Chairs of the House Appropriations and Senate Finance and Appropriations Committees by October 1, 2025, on a plan for the replacement of the Committee Electronic Tracking (COMET) and the Campaign Finance Management (CFM) systems.

Background:

ELECT currently provides for campaign finance filing and reporting through a system comprised of the following three components:

1. Committee Electronic Tracking (COMET). COMET is used by candidates, and advocacy and political groups to create committees and for the electronic filing of scheduled and special reports.

2. Campaign Finance Management (CFM). CFM allows ELECT staff to accept or reject the required Statements of Organization entered in COMET, to set up filing or reporting schedules for committee types, process penalties assessed on committees, and to store documents and notes on the committees.

3. Campaign Finance Reports (CFR). CFR enables the display of reports for public view.

The COMET and CFR components were put into use in 2012. CFM was put into use in 2019. The changes made and as well as efforts to amend campaign finance laws over the ast decade have clarified a need to modernize the current components to ensure adaptability and transparency.

Plan Research and Development

Review of public websites from other states:

ELECT used several methods to identify options for the improvement or replacement of COMET and CFM, as well as   Campaign Finance Reports (CFR), and to analyze the advantages and disadvantages of each option. Initially, ELECT conducted research on the vendors and systems used by other states from publicly available websites and information. In reviewing the sites, there was a mix of vendor-provided and in-house or state-built filing and reporting systems. (See attached Campaign Finance Systems Research by State).

Issuance of RFI:

ELECT issued a Request for Information (RFI) in June 2025. Responses received to a RFI are non-binding, and no award of a contract is made. The RFI was used to (i) gather information on the current products and services available that could potentially meet the business and system functions required, and (ii) understand the potential costs and implementation timelines for those products and services.

Review of ELECT-COV in-house option:

ELECT also reviewed and analyzed the potential option of in-house development using the Virginia Information Technology Agency (VITA)'s existing state contracts with approved vendors for services and tools.

RFI Issuance and Analysis

RFI Process:

ELECT issued the RFI on June 2, 2025. Vendors known or believed to have existing or to-be-built campaign finance systems or products were contacted and provided a link to the RFI. A conference call was held on June 20, 2025, to receive and answer vendor questions. Vendor responses were due to ELECT on July 28, 2025.

ELECT received 11 vendor responses to the RFI. All responses were reviewed by a team of campaign finance, policy, business analyst, technology, and senior management staff members (RFI Team). Clarification questions were asked and answered.

Additionally, vendor demonstrations of proposed systems were provided by seven of the responding vendors and reviewed by the RFI Team.

RFI Responses and Analysis:

While each vendor that responded indicated the capability to meet the required baseline functionality, differentiation in vendors was seen in other factors such as cost, base infrastructure setup, ongoing maintenance, and varying sophistication and availability of enhancements to system elements including user interface appearance, ease of use, and data analysis and generation features.

Aggregated Vendor Responses by Key Features:

Following is a summary of the range of responses received from vendors on high-level key features:

1. REQUIRED FUNCTIONALITY, CUSTOMIZATION, AND CONFIGURATION
   All responding vendors indicated the ability to meet the functionality whether by existing products and modules, configuration or customization of existing products and modules, or by building to suit Virginia's requirements. This was largely confirmed through system or product demonstrations the RFI Team received from seven participating vendors. The demonstrations ranged from high-level overviews to detailed walkthroughs of a wide range of functionality.

   Vendors with existing products described them as highly configurable. Others proposed to build wholly customized systems for Virginia specific requirements.

2. DATA MIGRATION
   Most vendors offered services to migrate data from the current system to the new system. A few vendors noted that they either created or used experienced teams to ensure successful data migration. In some responses, vendors indicated a decision point for ELECT related to archiving some data versus migrating it.

3. IMPLEMENTATION TIMELINE
   The time vendors estimated for implementation of the required functionality broke into two ranges with several vendors estimating in a range from 3-6 months and others estimating in a range from 12-18 months. Several vendors noted that the timelines were estimates based on the information in the RFI,

which is not as comprehensive as what may be included in a Request for Proposals (RFP).

4. Implementation Costs
   Implementation cost estimates for replacement of COMET/CFM/CFR functionality ranged from $240,000 to $3.9 million.

5. Annual Maintenance and Operations Costs
   Several vendors estimated the annual costs for Maintenance and Operations, which include maintenance, updates, hosting, security, and licensing, ranged from $250,00 to $400,00 with a few running between $500,000 to $800,000. Some vendors noted that costs could be affected by several factors including development of newly required functionality, support desk services, and where the system or product is hosted (e.g.: vendor cloud or ELECT/COV cloud).

   A few vendors indicated the option to build the system or product and hand it off to ELECT to manage. This option is discussed further in the Summary of Options section of this document.

6. Security and Hosting
   Nearly all vendors proposed hosting their systems or products with third-party cloud providers, which allows them to leverage all or most of the required Commonwealth of Virginia (COV) security features and services.

   Role-based access control, multifactor authentication, and data encryption in transit and at rest were common system or product security features for most vendors.

   A few vendors indicated a willingness to implement their systems or products within an ELECT/COV controlled cloud. This option is discussed further in the Summary of Options section of this document.

7. Vendor Assumptions
   The following is a compilation of assumptions noted by one or more vendors:
   a. Implementation timelines start upon the full execution of a contract (i.e.: post procurement process).
   b. While systems are highly configurable, customizations impact pricing.
   c. Data migration may require a choice by ELECT on whether to select a static data option or a customized data migration to a new model, which would extend the timeline and potentially the price.

d. The level of help desk or system support services may impact pricing.
e. Some vendors indicated the use of AI Chatbots or services; some noted additional costs for these items.
f. Hosting in COV/ELECT cloud is not an option for some vendors, but others were willing to negotiate related terms.
g. Maintenance and hosting by ELECT is an option for some vendors but would likely increase pricing (either in licensing fees or for initial implementation).

ELECT-VITA Partnership Option:

ELECT also reviewed an in-house option, in which ELECT would partner with VITA using COV infrastructure and vendors with existing state contracts to design, develop, and maintain a new campaign finance system. Below is a summary of a proposed in-house option:

1. Ownership and Experience
   ELECT and the Commonwealth own the intellectual property rights and documentation created for each current module, which would be leveraged in developing a new solution.

   ELECT staff members have been developing, adapting, and maintaining the existing system for more than a decade. This existing system, documentation, and accumulated business and IT staff knowledge will be leveraged for development, implementation, and maintenance of a cloud native, highly configurable, and adaptable replacement solution.

2. Customization and Modifications
   An in-house development ensures complete customization to Virginia specific statutory requirements. Development and implementation of future statutory changes will occur in the ordinary course of legislative implementation.

3. Data Migration
   ELECT will leverage the knowledge and experience gained through the operation of the current modules and VITA provided tools to address historical data conversion and ensure zero data loss.

4. Implementation Timeline

ELECT estimates the development and implementation of a new solution would be completed within 14-18 months. ELECT could begin the project in the fourth quarter of 2026 if funding is appropriated.

5. Implementation Costs

ELECT estimates the development and implementation costs to be between $3-3.5 million. The implementation costs are expected to be driven largely by the use of existing VITA staff augmentation contracts to supplement ELECT's campaign finance technical team.

6. Annual Maintenance and Operations Costs

Annual maintenance and operations costs will be integrated with existing ELECT information technology costs and, after implementation, included annually in the agency operating budget through the VITA forecast model. ELECT anticipates the ongoing costs for the Campaign Finance System would represent approximately a 3% increase in current costs, or about $180,000 annually, based on current VITA rates and charges.

7. Security

ELECT is required to comply with VITA Security Standards. As a result, an in-house system will meet or exceed all Commonwealth Security standards, including but not limited to the Information Security Standard (SEC530.01.1), the Information Technology Risk Management Standard (SEC520-5), and the Data Classification Standard (SEC540). ELECT currently uses, and will continue to use, multiple security tools and contracts available through VITA services and contracts to ensure and audit compliance with these standards.

8. Hosting

An in-house system will be hosted in the COV cloud tenant and leverage the security and infrastructure management conducted by VITA as noted in the Annual Maintenance and Operations Costs and Security sections above. This allows ELECT to maintain control of the platform and ensure a secure hosting environment.

9. ELECT Assumptions

ELECT will migrate the campaign finance system to its own dedicated servers within the same VITA/ELECT environment used for the Statewide Voter Registration System (SVRS).

ELECT staff have developed and maintained COMET and CFR since 2012 and CFM since 2019. A flurry of recent legislation has required new functionality and modifications to the existing modules. ELECT staff have completed the implementation

of these new requirements, including development of code modifications, stories, use cases, test scripts and testing, acceptance criteria, and documentation, each of which will be leveraged for the new solution.

ELECT staff will also leverage methodologies, standards, and lessons learned from the statewide voter registration system development. ELECT would follow the standards and service provisioning already set by the COV cloud vendor and approved by VITA.

Work on the campaign finance system could begin as soon as the fourth quarter of 2026 if funding is appropriated.

Summary of Options and Proposed Plan:

Summary of Options:

Market research has provided information on the potential size of the vendor pool, the range of costs and implementation timelines, and the security features available. This review has also identified multiple variables that could affect each of these items.

Functionality

Multiple vendor responses and demonstrations provided campaign finance systems that are in use or are to be built meet most if not all identified functionality needed, are hosted in vendor cloud environments that meet the most common security features and requirements, and have reasonable implementation timelines.

Technology Infrastructure and Maintenance

From a technology infrastructure and maintenance perspective, the vendor solutions can generally be categorized into three alternatives: vendor product that is hosted and maintained by the vendor in the vendor environment, vendor product that is maintained by the vendor in ELECT's environment, and vendor product that is handed off to ELECT for maintenance and hosting in ELECT's environment.

1. A vendor product hosted in the vendor environment, maintained by the vendor
   In this model, the vendor provides all development, upgrades, updates, enhancements, etc. for an annual fee, subject to the terms of the contract awarded. The vendor either owns the hosting environment or has a direct contractual relationship with a third-party cloud vendor, meaning ELECT and the COV have less visibility and control over the security, development, and performance of the product.

   The selection of a vendor requires completion of the state procurement process, which would include the issuance of a Request for Proposals (RFP), evaluation,

and negotiation with at least the top two scored vendors, the acceptance by the vendor of VITA standard terms and conditions, and COVRamp compliance. Depending on costs and complexity, high-risk review requirements would apply, requiring reviews by the Office of the Attorney General and VITA before issuance of the RFP and prior to award of a contract. (*See* Va. Code § 2.2-4303.01).

ELECT would also be required to issue new competitive procurements every 3-5 years following initial implementation depending on the number of contractual renewals, quality of performance from the product and vendor, and ability to maintain competitive pricing.

2. A vendor product hosted in a COV environment, maintained by the vendor
   In this model, the vendor provides all development, upgrades, updates, enhancements, etc. within a COV controlled environment for an annual fee, subject to the terms of the contract awarded. The COV owns the hosting environment or has a direct contractual relationship with a third-party cloud vendor. ELECT and the COV have greater visibility and control over access and the security of the product.

   As in Model 1 above, the selection of a vendor requires completion of the state procurement process and all related conditions and requirements. Special attention will need to be paid to the service level agreements, terms and conditions, and processes by which the vendor will be provided with access to perform needed maintenance, updates, and enhancements. This model will result in fewer vendors in the pool.

3. A vendor product hosted in a COV environment, maintained by ELECT
   In this model, subject to the terms of the contract awarded, the vendor provides initial development and implementation of the product within an environment the COV owns or for which it has a direct contractual relationship with a third-party cloud vendor. ELECT and the COV have greater visibility and control over access to and the security of the product.

   Once implemented, generally in return for an annual licensing or other negotiated remuneration, the vendor hands over the maintenance and operation of the product to ELECT. It is vital to ELECT's success in this model for ELECT staff to have or quickly acquire knowledge of and experience with the vendor's code base and system documentation.

As noted for Model 1 above, the selection of a vendor requires completion of the state procurement process and all related requirements. Special attention will need to be paid to the type and limitations of the license granted, the training and documentation required of existing ELECT staff to develop and maintain the product, and provision for a thorough transfer of knowledge on all facets of the product from the vendor to ELECT staff. This model will result in fewer vendors in the pool.

Procurement and Contract

As noted above in the Technology Infrastructure and Maintenance section, any contract with a vendor will be awarded in compliance with the Virginia Public Procurement Act (VPPA). The VPPA requires competitive procurement to the extent possible for the purchase of goods and services by Virginia government agencies. ELECT would seek competitive procurement via the issuance of a Request for Proposals (RFP) and use of competitive negotiations. The timeline for competitive procurement from the issuance of the RFP to an award of a contract varies but can take more than a year. Prior to and in preparation for issuance of the RFP, ELECT would need to consult with VITA to determine whether the procurement will be determined "high risk" and would potentially need to contract for services to assist with the development and documentation of the business and system requirements.

Any proposed award of a contract in which the vendor will either host the system or solution in a vendor provisioned cloud environment or implement the vendor product in a COV environment requires adherence to VITA Security Standards, including COVRamp (a cloud service assessment modeled on FedRamp). The review and analysis of compliance takes place during the negotiation portion of competitive procurements.

As noted above, depending on the complexity or the anticipated costs of vendor implementation, including annual renewal options for maintenance, hosting and operations, a procurement of the new campaign finance system could be categorized as high-risk. High-risk procurements require additional oversight and reviews by VITA and the Office of the Attorney General.

Commonwealth Build – ELECT Experience

ELECT has developed and maintained the current campaign finance system components for over a decade, including through multiple recent legislative sessions that resulted in the need for the development of new and expanded functionality. As a result, ELECT business and technical teams have gained a high level of knowledge about the functionality needed and experience with how to create, maintain, and operate it.

Prior to 2024, cloud offerings from VITA were limited mostly to standard compute storage. Today, VITA offers a full suite of cloud tools, including microservices and cloud native services, for example, Azure Data Factory, Synapse pipelines, and Key Vault. ELECT has already gained experience with many of these tools and services, which can be leveraged to develop native cloud solutions more efficiently and cost effectively.

A Commonwealth-built solution will leverage existing, previously competed VITA technology services contracts, which will greatly reduce the procurement timeline required by the VPPA. For example, the issuance of an RFP, negotiations with multiple vendors, ensuring compliance with COVRamp requirements, and the potential for high-risk reviews would not be required, allowing internal project planning and development to begin sooner.

Once implemented and live, ELECT and the Commonwealth would own the solution, and would continuously maintain, enhance, update, and improve it without the need to issue additional competitive procurements. This option also ensures the highest level of Commonwealth control over the development, updating, enhancement, maintenance, and security of the solution.

Proposed Plan:

After researching and reviewing publicly available information on solutions used in other states, conducting market research and analysis using an RFI, and researching and analyzing the potential viability of a Commonwealth-built, cloud-native system, the Department of Elections recommends pursuing an ELECT-COV partnership to develop a campaign finance system built to Virginia's specifications, that is hosted, secured, and maintained by the Commonwealth. The Department further recommends beginning the project in the fourth quarter of 2026, subject to funding being appropriated.

Attachment

Campaign Finance Systems
Research by State
February 2025

State	System	Link to Filing Videos
Maryland	Maryland Campaign Reporting Information System (MDCRIS)	https://www.youtube.com/watch?v=YcbNIJCo-i8
North Carolina	Campaign Finance Remote Software (CFRS)	https://s3.amazonaws.com/dl.ncsbe.gov/Campaign_Finance/Videos/Entering%20Committee%20Transactions.mp4
Washington	Online Reporting of Campaign Activity (ORCA)	https://www.youtube.com/playlist?list=PLJT8bJkkURz0LIBLFUNPqGpNj75F3plv1
California	Cal-Online	
Maine	Maine Ethics Commission	https://www.maine.gov/ethics/sites/maine.gov.ethics/files/inline-files/FileIEReport.mp4
Connecticut	Electronic Campaign reporting system for candidates (eCRIS)	
D.C.	Office of campaign finance efiling (OCF)	
Kansas	Efiling	
Missouri	Missouri Ethics Commission	https://www.youtube.com/watch?v=aE5b5tUFAMw&list=PLlG_vODb3gcgIeuINDkmkIvUsX-dsPwUP
Alaska	myAlaska	https://prezi.com/v/3nftu7p9iw8g/how-to-report-contributions/
Montana	Campaign Electronic Reporting System (CERS)	
Alabama	Fair Campaign Practices Act (FCPA) Reporting System	
Arizona	BEACON	
Arkansas	Public Disclosure and Filing	
Colorado	TRACER	https://www.sos.state.co.us/pubs/elections/CampaignFinance/files/TRACERmp4/Contributions-Adding.mp4
Delaware	CF Reporting System	
Florida	EFS	
Georgia	CFS	
Hawaii	CFS	
Idaho	Sunshine	https://www.youtube.com/playlist?list=PLiV5den_WpIzP8llaEAWX6IgZXmZvHrPj
Illinois	IDIS	

Indiana	CFD	
Iowa	Web Reporting System (WRS)	
Kentucky	Kentucky Election Finance Management System (KEFMS)	https://kref.ky.gov/_layouts/download.aspx?SourceUrl=https://kref.ky.gov/efile/Documents/Filing%20a%20Statement%20of%20Spending%20Intent%20First%20Time%20Cand.ppsx
Louisiana	Campaign Finance Portal	https://eap.ethics.la.gov/EthicsHelp/Videos/LEADERS/Submission/help.aspx
Massachusetts	OCPF	https://www.ocpf.us/Home/Videos#undefined
Michigan	Campaign Finance Disclosure	https://www.youtube.com/embed/NaW5ib1yLQQ?modestbranding=1&version=3&hl=en_US&rel=0&fs=0
Minnesota	Campaign Finance Board	https://cfb.mn.gov/html/training/CFR/CFRO_Filing_a_report/Filing_a_report.html
Mississippi	Campaign Finance Filers	
Nebraska	First Tuesday	