

# Implementation Plan

## Multnomah County Public Campaign Financing

Presented by the Multnomah  
County Public Campaign Financing  
Implementation Advisory Committee

April 2025



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# Introduction

The last two decades have been challenging for democracy. A series of Supreme Court rulings and federal inaction have unleashed a flood of money into our elections. Local races are seeing the rise of donors and organizations spending more and more money to influence voters. Candidates must keep pace, which has created a pressure on those running for office to spend more of their time raising money.

This has created a myriad of problems for democracy.

It causes the public to develop a mistrust of our elections, because voters recognize the problematic dynamic of candidates relying on those who can afford to make the largest donations. A 2023 study by the Pew Research Center found that 80 percent of Americans believe that “the people who donate a lot of money to their political campaigns have too much influence when it comes to the decisions that members of Congress make.”<sup>1</sup> While that study was referencing Congressional campaigns, the fundamental perception of corruption has permeated throughout the country to include local offices. Concerns about money in politics drove 88.5 percent of voters to support contribution limits for County offices in 2016<sup>2</sup>, and 86.6 percent of Multnomah voters to support Measure 107 in 2020<sup>3</sup>, which amended the state’s constitution to allow for contribution limits and more transparency laws.

The necessity of focusing time, resources and energy on fundraising creates barriers for candidates from underrepresented communities to run for office or have their voices be heard. If access to networks of wealthy donors is required for a candidate to raise enough to get elected, then people from economically disadvantaged communities will find it harder to run competitive campaigns. Recent studies have shown that candidates who are female and/or People of Color rely more heavily on smaller donations than candidates who are male and/or White; and a 2010-2018 analysis showed that donors from the top-contributing majority-White neighborhoods give 10 times more than donors from the top-contributing majority-Minority neighborhoods.<sup>4</sup> These reasons influence why women, People of Color, and low income people are underrepresented among campaign donors and face more barriers to winning elected office.

The high costs of running for office puts tremendous pressure on candidates to raise as much money as they can. That pressure can create a reliance on a relatively-small population of wealthy donors and organizations. Candidates can feel obligated to spend more time engaging with these donors. And if other organizations decide to spend significant sums as independent expenditures, then they threaten to drown out the voices of the candidates themselves.

Public campaign financing is the solution to this issue. This is a constitutional<sup>5</sup> and time-tested method, affirmed by the US Supreme Court, that can pave the way forward. Currently, 14 states and 26 municipalities, including Portland, OR, offer some form of public financing for their candidates, with 40 programs in existence across the United States.<sup>6</sup>

These are optional programs for candidates. Candidates pledge to raise small donations from individuals and qualifying organizations, and to reach beyond their traditional donor lists to engage

1 <https://www.pewresearch.org/short-reads/2023/10/23/7-facts-about-americans-views-of-money-in-politics/>

2 [https://multco.us/file/update\\_17\\_-\\_final\\_official\\_summary\\_results/download](https://multco.us/file/update_17_-_final_official_summary_results/download)

3 <https://sos.oregon.gov/elections/Documents/results/november-general-2020.pdf>

4 <https://www.brennancenter.org/our-work/research-reports/small-donor-public-financing-could-advance-race-and-gender-equity>

5 <https://www.brennancenter.org/our-work/research-reports/governmental-interests-support-public-financing>

6 <https://www.brennancenter.org/our-work/research-reports/guide-public-financing-programs-nationwide>

more people in their campaigns. In exchange, the jurisdiction provides public funds to their campaigns. These public funds allow the candidates to run for office—and compete to win—without needing to rely on large donations or the support of third party organizations. Because of the matching funds, a small dollar donor can have more impact on a candidate’s campaign.

These programs help reinforce trust in our democracy. Since a candidate can win with the support of many small donors, the perception of corruption is largely removed. The US Supreme Court has found that jurisdictions have a legitimate interest in curbing actual or perceived corruption.<sup>7</sup>

There are many other benefits to public financing. Candidates are incentivized to spend more time campaigning in all communities they seek to represent, and connecting with everyday residents. When residents are engaged by local candidates, they can often become more engaged in their democracy, which increases public participation. Washington, DC found that donor participation rates skyrocketed in majority-Minority areas after it implemented public financing.<sup>8</sup> This allows people with wide support among underrepresented populations to consider filing for office because the matching funds enable them to more effectively run robust campaigns.

It is important to clarify what public financing programs do not do. First, public financing does not stop or reduce independent expenditures from third party organizations. According to the Supreme Court, that is constitutionally-protected speech.<sup>9</sup> This spending can still be significant enough to influence elections. But what public financing can do is ensure that candidates with popular support still have enough resources to communicate their messages and engage voters. Second, receiving public matching funds does not guarantee that a candidate will win or even perform well at the ballot. There are dozens of factors that impact a candidate’s success, including the political climate, the background and skillset of the candidate, and the unique circumstances of that race. But what public financing can do is help ensure that access to money is not a defining factor for who runs or wins.

If well-administered, public financing programs can meaningfully transform local politics for the better.

Through their research and evaluation of similar programs around the country, the IAC found that these programs have embraced tried and true practices that enable their success. They often carefully review donations for compliance, prohibit the public funds from being misused, have ample oversight, and can be responsive to the constantly-changing campaign finance landscape. They tend to reward candidates for growing their support among small-dollar donors who reside in the jurisdiction. And they have processes to carefully steward—and efficiently use—taxpayer dollars.

When the Board of County Commissioners established the Multnomah County Campaign Public Financing Implementation Advisory Committee, it charged us with developing a series of recommendations for how to build the right public financing program for Multnomah County. After working diligently for months, we have finished our report. This deliverable provides the Board with 10 thoughtful policy recommendations on the most fundamental components of these programs. You will see an account of the deliberations, the research, the data, and the factors that went into crafting the proposals.

As the IAC, we sincerely hope that the Board takes action and leads us into a brighter future for our democracy.

7 <https://www.brennancenter.org/our-work/research-reports/governmental-interests-support-public-financing>

8 [https://campaignlegal.org/sites/default/files/2021-10/CLC\\_DemocratizingTheDistrict%20%281%29.pdf](https://campaignlegal.org/sites/default/files/2021-10/CLC_DemocratizingTheDistrict%20%281%29.pdf)

9 <https://www.brennancenter.org/our-work/research-reports/citizens-united-explained>

# Executive Summary

## Purpose

The Multnomah County Board of County Commissioners established the Public Campaign Finance Implementation Advisory Committee with a clear mandate: to formulate a comprehensive set of recommendations for the implementation of a public financing program within County elections. This program would encompass the positions of: County Chair, County Commissioner, Sheriff, and Auditor. The Multnomah County District Attorney is technically a State position that does not fall under the scope of this work.

## Opportunity

Public financing, as detailed in this report, has the potential to be a transformative policy, capable of generating numerous benefits, including fostering a more inclusive democracy by incentivizing candidates to actively engage with small-dollar donors from all communities. Furthermore, it can mitigate both actual and perceived corruption by enabling candidates to rely solely on small-dollar donors to run competitive campaigns. This allows candidates from diverse backgrounds to effectively communicate their values to the public and engage with residents. Ultimately, this can cultivate greater public trust in the electoral process. These positive outcomes have been observed in other jurisdictions that have implemented similar programs, suggesting that Multnomah County could also experience significant improvements.

## Recommendations

The IAC has meticulously developed a series of vetted and pragmatic policy recommendations on 10 key areas. These recommendations are grounded in direct experience, extensive research, and rigorous data analysis, culminating in a thoughtful and comprehensive policy package. The topics addressed encompass the fundamental elements required to establish a successful public financing program.

### Budget and Funding

- Establish a \$5 million fund from the General Fund in Fiscal Year 2026
- Establish a funding formula of \$5-per-Multnomah County resident for each year following FY26, which would adjust for inflation

### Program Oversight

- The public campaign finance program will report to an independent volunteer oversight commission consisting of 9 members. The members will be voted on and appointed by the Board of County Commissioners, with the Board nominating 5 and the oversight commission nominating 4 of the members.
- Unless already established by the County Board, in the County Charter, by State or Federal law, the PCF Oversight Commission will have the administrative rulemaking authority to establish policies and practices for the program, evaluate the program's performance and make public recommendations to the Board.

## Match Grant Caps

- Participating candidates are eligible to each receive the following maximum amounts of matching funds per election cycle:
  - Chair candidates: \$650,000
  - Commission candidates: \$250,000
  - Sheriff candidates: \$100,000
  - Auditor candidates: \$50,000

## Method of Distribution

- The County should adopt a flat grant distribution method, where the matching funds are accessible to candidates in tiers. Candidates can reach tiers only if they demonstrate growing public support through fundraising from enough qualifying individuals.
  - The exact amounts of matching funds and the number of donors required to qualify for each tier is as follows:

	<b>Tier 1</b>	<b>Tier 2</b>	<b>Tier 3</b>	<b>Tier 4</b>
<b>Chair</b>	200 donors \$50,000	500 donors \$200,000	1000 donors \$200,000	1500 donors \$200,000
<b>Commissioner</b>	100 donors \$40,000	250 donors \$70,000	500 donors \$70,000	750 donors \$70,000
<b>Sheriff</b>	100 donors \$30,000	150 donors \$35,000	200 donors \$35,000	–
<b>Auditor</b>	100 donors \$30,000	150 donors \$20,000	–	–

## Qualification Thresholds

- To qualify for matching funds, candidates must demonstrate public support by fundraising from enough qualified donors (the exact amounts are included in the Method of Distribution table). A qualified donor is a unique individual who contributes at least \$5, resides in Multnomah County, and is allowed to give under local, state, and federal law. The candidate must also be in compliance with the program's rules, run in a contested election, and complete a training provided by the program staff.

## Contribution Limits

- Participating candidates must abide by a contribution limit of \$350 per qualifying individual or organization, which will be adjusted for inflation. Small donor committees do not have contribution limits as long as they meet the definition, which should be aligned with the state's definition.

## In-Kind Donations

- The in-kind donation rules should align with the state's rules to reduce confusion and promote compliance. Membership organizations should be permitted to donate up to 12 months equivalent to the costs of 1 full-time equivalent (FTE), as long as the donation goes towards specific actions that organize or engage residents. Membership organizations can also contribute the costs of transportation, food, office space and incidental gifts up to a certain limit, and provide unlimited donations for enumerated items that allow for accessibility or program compliance. This recommendation is contingent on local or state law changing to permit this type of donation.

## Violations and Penalties

- For potential violations, the program will emphasize education and open communication more than penalization. The program will provide ample opportunities for campaigns to fix accidental violations within a Cure Period to avoid paying a penalty. If the program must carry out an investigation and assess a penalty, it will do so within the guidelines established through Administrative Rules. The County should explore a potential MOU or IGA with the Secretary of State's Oregon Elections Division to enforce the program's rules.

## Spending Restrictions

- Restrictions should be placed on how qualifying campaigns can spend matching funds, to avoid waste, fraud, or spending on items that personally enrich a candidate or contravene the democratic values behind the granting of matching funds. Those restrictions should be established through Administrative Rules.

## Reporting Timeline

- Participating candidates must report contribution and expenditure transactions to program staff using the same timeline as candidates are required to report contribution and expenditure transactions to the Oregon Secretary of State's office, which is:
  - Once every 30 calendar days after the contribution is received or an expenditure is made;
  - Once every 7 calendar days after the contribution is received or an expenditure is made, during the period beginning 42 calendar days before the election

## Methodology

The IAC and its subcommittees convened 28 times over 5 months, holding meetings that were transparent and open to the public. To ensure that the policy package was comprehensively-developed, the IAC examined an extensive array of data and research. This included publicly available donation data from the Oregon Secretary of State's website, along with anonymized donor data from recent County campaigns, safeguarding individual privacy while obtaining valuable information about local campaign finance dynamics. The research was backed by an exhaustive review of publicly available materials from public finance programs across the country, which enabled the IAC to learn from the successes and challenges of similar initiatives in other jurisdictions.

## Implementation and Next Steps

To ensure the timely implementation of this program for the 2026 election, the Board of County Commissioners has a series of steps it can take in the near term. These include adopting a program budget for FY 2026 and establishing a sustainable funding formula for future years, which ensures the program's financial viability. Additionally, the Board can pass a resolution expressing formal support for launching the program, signaling its commitment to campaign finance reform and enabling program staff to proceed to the next project phase. With this resolution and budget allocation, program staff can then establish the oversight commission, begin formulating the program's administrative rules, and conduct community education. Within the subsequent 2-3 months, the Board can review and incorporate the IAC's recommendations into a policy package and enact it as an ordinance, which would codify the program. These steps would allow the program to launch by December 2025.



# Background

The Board of County Commissioners had been exploring what would be required to establish a public campaign financing program for County elections. The County took action in 4 distinct time phases.

## 2022-2023

The Board allocated \$75,000 in FY2023 to research and develop a report on the implementation of a public campaign financing program. That policy memo was written and delivered in May 2023. This report will review those findings later in this section.

## May-July 2024

The Board sought more in-depth guidance about developing a public campaign financing policy and program. To achieve this, the Board authorized the establishment and facilitation of the Public Campaign Finance Implementation Advisory Committee, which would then issue a report to the Board of County Commissioners detailing recommendations for how to implement public financing in Multnomah County. The intention was that once the Board had reviewed the report's recommendations, it could then consider passing a resolution to affirm its desire to establish such a program, pass ordinance language embedding a policy package into the County code, and allowing the program to proceed with implementation.

The Board allocated \$1 million in fiscal year 2025 (FY25) to explore and develop a public campaign finance program for County elected offices (Chair, Commissioners, Auditor, and Sheriff). \$500,000 was allocated to create and facilitate the advisory committee, and \$500,000 was earmarked in General Fund Contingency for implementation pending Board approval. These funds are ongoing, not one-time-only, and so are built into the planned expenditures going forward. In the process, the Board approved two budget notes which established certain requirements.

1. The first [budget note](#) established the project scope, requirements and timeline:<sup>10</sup>
  - Hiring of a Project Manager;
  - Establishment of a Public Financing Implementation Advisory Committee no later than October 15th, 2024, with an initial first meeting to take place by November 15th, 2024. Each board member and the Chair, will have the opportunity to select 2 people from their district who applied for this limited duration volunteer Implementation Committee. The members of the Committee will be tasked with ultimately creating, advising, informing and issuing recommendations to the Board on how best to implement public financing in our Multnomah County elections. That work will include:
    - Examining potential governance structures for a permanent independent oversight body, including recommendations on how best to partner with the City of Portland's Small Donor Elections;
    - Looking at financing options to fully fund a small donor program, and development of administrative rules and forms;
    - Scoping relevant technology, staffing, and other materials and supplies needed to effectively operate a small donor program;
    - A schedule for reporting to the Board; and
    - A plan for transitioning of the Implementation Committee to an Oversight Committee.
  - Prepare a report for the Board of County Commissioners by February 28th, 2025. It will include

10 <https://multco.us/info/budget-note-public-campaign-finance-program-update>

an overview of similar work in other jurisdictions, the legal frameworks that were used, and key milestones for implementing recommendations described above. This will be followed by a vote of the Board requesting the adoption of those recommendations as County policy;

- Milestones should include plans for collaboration with community partners, such as the City of Portland’s Office of Small Donor Elections, all towards an anticipated program launch by December 1st, 2025;
  - Creation of a sub fund of the General Fund dedicated to this program; and
  - Briefings to update Commissioners on the progress of the work at their request.
2. The second budget note [budget note](#), required that a program budget be drafted before the IAC was convened. County staff provided this initial estimate to comply with the budget note:

Budget Item	Amount	Notes
Personnel	\$213,298	1.00 FTE Management Analyst position
Contractual Services	\$229,702	External facilitation, community engagement, legal analysis, and reimbursement to partners
Materials and Supplies	\$57,000	Includes stipends for committee members, translation, and space rental
Technology	\$250,000-\$500,000	Funds to be expended only after the program has Board approval
<b>Total</b>	<b>\$1,000,000</b>	

## July-December 2024

The COO’s Office was charged by the Board with establishing the Implementation Advisory Committee. Members of the public could apply between October 7th and November 11th. Each Board member then appointed two individuals to the committee, with 10 in total. These individuals were: Felisa Hagins, James Ofsink, Roxanna Pinotti, Kari Christolm, Beth Chvilicek, Becca Uherbelau, Terrence Hayes, Dwight Adkins (who later resigned and Kezia Wanner was appointed to fill the vacancy), Marshall McGrady and Luong Nguyen. They were informed of their appointment on November 27th. The County then hired Daniel Lewkow to the Public Campaign Finance Program Manager position, and the first IAC meeting was held on December 17th, 2024. A number of circumstances led to this section of timeline being lengthened beyond the provision in Commissioner Beason’s note. However, program staff adopted several practices that helped reduce delays and expedite the process.

## December 2024-April 2025

IAC and its subcommittees met 28 times and developed recommendations on 10 topic areas. All meetings were open to the public. A recording of every meeting can be found at [link.multco.us/public-campaign-financing-IAC](https://link.multco.us/public-campaign-financing-IAC). The IAC formed 4 subcommittees: In-Kind Donations, Contribution and Spending Limits, Violations & Penalties, and Program Oversight. The subcommittees were formed so that the IAC members could focus on specific topics that would involve more discussion. The full committee and the subcommittees met concurrently, which allowed it to make decisions on topic areas in a much faster timeline than if the full committee had to build each policy recommendation from scratch. The IAC then considered all subcommittee recommendations in addition to other policy topics, and issued them in this report. Herewith is the completed deliverable that was envisaged in 2024.

## Takeaways from the 2023 Public Financing Report

Multnomah County had commissioned a report to explore potential public financing options and provide preliminary recommendations on a program for the County to implement. The report, completed in May 2023 and authored by Dan Eisenbeis, Project Manager with Multnomah County Elections Division, delved into the intricacies of public financing programs implemented in four major cities: Portland, Seattle, New York City, and Denver.

The 2023 report compared each city's approach, and then offered a series of recommendations tailored to Multnomah County's specific circumstances, outlining potential structures and features of a County public financing program. The top recommendations are listed below:

1. *Establish an independent, non-partisan program oversight commission with authority to make expenditures, conduct administrative rulemaking, issue advisory opinions, conduct investigations, assess penalties, and oversee staff.*
2. *Authorize the commission to make reasonable revisions to program contribution limits, qualification thresholds, and match amounts based on specified factors such as program effectiveness and inflation.*
3. *Approve funding mechanism that provides a predictable level of funding.*
4. *Consider funding from a dedicated non-general fund source.*
5. *Provide for independence in program budgeting commensurate with general oversight of the program.*
6. *Budget Estimation*
  - a. *Small Donor Matching Program Software: \$400,000-\$700,000 one-time costs and \$150,000 annual recurring costs*
  - b. *Personnel: \$370,000-\$590,000 per year (2 to 4 FTE plus temporary staff)*
  - c. *Public Matching Funds: \$5 million every four years*
  - d. *Additional costs for overhead, hearings officer, commission*
7. *Model definitions, policy framework, and reporting requirements on Portland SDE program.*
8. *Leverage existing data for program administration.*
9. *Minimize duplication of reporting requirements for participating candidates.*
10. *Explore intergovernmental agreement with City of Portland for program administration.*

As the reader will see in our report, the IAC independently arrived at a number of the same conclusions. It also made similar recommendations on points #1, #3, #5, and #7, while diverging on the other points for reasons that will be detailed in this document. On #8-#10, County staff are exploring potential options that would allow the program to receive reports, with the goal to facilitate or reduce the administrative burden on campaigns.

On the 2023 report's budget recommendation, our cost estimates were similar to those made in point #6, particularly for technology and personnel costs. The divergence between our reports was on the amount to recommend for matching funds. The 2023 report recommended \$5 million every four years in matching funds, but cautioned that the amount depended on how many candidates ran and what is the total amount of matching funds (the "match grant cap") provided to candidates. Our in-depth analysis predicted slightly more candidates qualifying for the program than is predicted in the 2023 report. This is due to the higher anticipated number of candidates running when the County implements its new ranked choice voting system beginning in 2026, which in other jurisdictions has led to increases in the candidate pool sizes. That is why our budget modeling calls for the program needing \$6.8 million in matching funds over four years. Our analysis and the recommendation are further detailed in the Budget section of this report.

## Values Statement

Since the IAC would be evaluating many different policy options, it sought to develop a values statement. This would be a lens that guided the work, to ensure that the committee was making decisions grounded in their shared understandings and core principles. Each IAC member was invited to share their core values when developing a public funding proposal. Those contributions were then analyzed to find similarities and collated into a succinct statement. The IAC members valued creating a policy that was easy to understand, run with financial integrity, and accessible to community members. Here is the IAC's values statement:

The Multnomah County Public Finance Program Implementation Advisory Committee seeks to establish a small donor matching program that is:

1. Simple and easy to understand for candidate campaigns, organizations, and the public;
2. Run with fiscal responsibility, transparency, and accountability to the public;
3. Accessible to community members, including small dollar donors and candidates from underrepresented backgrounds;
4. Funded sufficiently and sustainably, so that participating candidates can run competitive campaigns and communicate with voters, who can then cast informed votes; and
5. Implemented and administered in a manner that gives the communities confidence that their perspectives are represented and that the program is being run competently.

# IAC Recommendation: Budget and Funding

## Recommendation:

1. The Implementation Advisory Committee Recommended: Establish a \$5 million fund from the General Fund in Fiscal Year 2026
  - a. The budget package would include matching funds for the 2026 election cycle, and administrative costs for staffing, technology, materials, facilities and internal services
  - b. The budget would be \$4,050,000 in matching funds
  - c. Requested that County staff refine cost estimates for startup and 2026 cycle operations
2. The Implementation Advisory Committee Recommended: Establish a funding formula for each year following FY26
  - a. The funding formula would be based on a per-resident calculation to ensure equitable funding
  - b. The funding rate would be \$5 per resident, adjusted for inflation and the consumer price index
  - c. The formula would be based on the latest population estimate for Multnomah County.
  - d. The fund would roll over annually for up to 4 years
  - e. There would be a cap on the fund not to exceed 2% of the total county general fund in any given year
  - f. Request is that the Budget office will plug the numbers into the formula and determine the exact projected amount, based on their understanding of the CPI and the County's demographic trends

## Explanation:

One of the most significant threats to public financing programs is the risk of underfunding. Devastating underfunding can occur for a variety of reasons, such as the heightened costs due to more candidates than anticipated qualifying for the matching funds, a sudden budget crisis for the jurisdiction, and lawmakers attempting to gain a perceived advantage over potential electoral opponents by denying them enough matching funds to campaign effectively. Throughout the nation, public financing programs constantly face the threat of underfunding. And that constant threat creates a dynamic of instability for these programs.

Unstable funding can have significant negative impacts on a public financing program. As an example, consider the possibility of a larger than expected candidate pool without clear, stable funding levels. A larger candidate pool means that significantly more candidates sign up for the program and qualify for matching funds; which increases the amount of resources needed to provide matching funds to qualifying candidates at previously-approved levels. This unpredictability may create challenges for campaigns, denying them the clarity they needed to build a budget and plan their strategies.

The IAC sought to proactively avoid this situation from developing at the County by recommending that the County Commission adopt a funding formula. Establishing a consistent funding formula guarantees stability for the program's budget. This reliability is crucial for supporting an expanded candidate pool, which may be a direct consequence of the implementation of Ranked Choice Voting for County races beginning in the November, 2026 general election and unexpected special elections. A predictable funding level is integral to the program's efficacy; without it, the program cannot confidently communicate matching amounts to candidates. Furthermore, a consistent funding formula would eliminate any perception or accusation of conflicts of interest for elected officials who both decide the amount of program funding while simultaneously considering running for County office.

The IAC recommended a funding formula based on a per-County resident calculation, to ensure equitable funding. The funding rate would be \$5-per-resident, adjusted for inflation and the consumer price index. The County Budget Office utilizes CPI-W West Size A when calculating inflation, and this recommendation supports utilizing this metric when estimating inflation in the future. The formula would be based on the most recent population estimated for Multnomah County. The IAC requests that the County Budget Office determine that exact amount, based on their understanding of the consumer price index and using the County's projections for the number of residents.

The funding formula may yield more than the minimum required for a particular year. The IAC recommended allowing for the rollover of funds, which provides enough funding in case a higher number of candidates qualify for matching funds and/or an unexpected special election. Additionally, the spending pattern will be unlike most other County programs, because the majority of spending will occur during the few months leading up to the election, rather than a consistent amount over 2 years. The annual funding formula will allow for that buildup of funds. For these reasons, the IAC recommended that the unspent funds rollover annually for up to 4 years in a separate sub-fund of the General Fund. The IAC also recommended that the program fund would be capped at 2% of the general funds in any given year. It is unlikely that the program would need this amount of funding in the near-future. Establishing a cap on the percentage of general fund resources that can be allocated to the program communicates to the public that the program only requires a modest investment to succeed.

Finally, the IAC recommended that the County Commission initiate the program with \$5 million in startup funds in Fiscal Year 2026. That would cover the anticipated costs of matching funds for the 2026 election cycle, personnel, facilities internal service rates, and the cost of building software for the campaigns to securely report transactions to the program. It was not expected that the program would need that amount of funding every year going forward. The technology development is a one-time cost, and once the rollover creates a modest financial cushion, the program will need less annual funding in future years. The formula developed for the recommendation should yield a need for general fund resources between \$3.8 million and \$4.3 million each year between 2026-2029 (see appendix).

For now, the IAC recommended that the program be funded from the general fund. While the IAC expressed interest in exploring the possibility of an independent funding stream, the timeframe for developing this report did not permit further study of a potential recommendation on that topic.

### Anticipated Budget for 2025-2026 Election Cycle

Matching Funds	\$4,050,000.00
Personnel	\$417,605.00
Facilities and Internal Services	\$31,500.00
Technology development and maintenance	\$500,000.00
<b>Total</b>	<b>\$4,999,105</b>

### Methodology

This is the formula that the IAC used to establish the budget for the program's matching funds:

**Matching Funds Required Per Cycle** = (Historic Cost Per Voter) x (Inflation Rate) x (Anticipated Voter Turnout) x (Future Inflation) x (Anticipated Number of Candidates Qualifying for Matching Funds)

To calculate this amount, we relied on a combination of historical data and analysis from other municipalities to build a projection. The data itself is viewable in the report's appendix.

- **Historic Cost Per Voter:** This figure is determined by analyzing past elections and dividing the total amount spent in a particular race by the number of voters who turned out for that race. This provided a baseline cost for what campaigns need to be competitive. We compiled that data for 23 of the most competitive candidates who ran for every County office between 2014 and 2024. That number was then adjusted for inflation using an available online tool, to then compare the cost per voter across races and election cycles.<sup>11</sup> The dataset was separated between elections held before and after the Charter Amendment's contribution limits were enforced in 2021, which told us how much was needed to run a robust campaign.
- **Anticipated Voter Turnout:** This is an estimate of how many voters are expected to participate in the upcoming election. This figure was based on historical turnout patterns, current voter registration numbers, and population trends.
- **Projected Cost per Voter:** We then took the average cost per voter (for races before the contribution limits were enforced) and multiplied it by the number of voters anticipated in future elections. We then understood how much candidates will need to run a competitive campaign for the next few cycles. That number was then adjusted for projected inflation on a yearly basis.

<sup>11</sup> <https://www.calculator.net/inflation-calculator.html>



- **Matching Funds:** After determining the total funds necessary for the campaigns, we calculated the amount of matching funds required for the campaigns to meet their financial needs. That involved taking the totals from the projected cost per voter and subtracting the average amount that candidates could typically raise with contribution limits. That established the gap between how much candidates could be expected to raise versus how much they needed to campaign effectively. The matching funds are designed to fill that gap to help candidates better communicate with voters and engage people in our democracy. The matching fund totals were then rounded to a number that would be easy to communicate with campaigns and the public.
- **Anticipated Number of Candidates Running, Participating and Qualifying for Matching Funds:** We needed to then establish how many candidates would be receiving those matching funds. A few factors made this challenging, including that only a portion of the candidates would qualify for matching funds, and that the County's planned shift to a single ranked choice voting election starting in November 2026 will likely attract more candidates to run. We analyzed data from other jurisdictions to predict the number of candidates who would run when the program is established, because Seattle and New York City both have public campaign financing and both recently moved to ranked choice voting. The estimated percentage of candidates who participated and qualified was based on an average from Portland's experience over the last 3 election cycles (we were careful about using Portland's 2024 election numbers because a number of other unique factors led to a record number of candidates running for office then). After collecting and analyzing all this data, we were able to project the number of candidates who will receive matching funds in future elections.
- **Matching Funds Budget:** Following this process, the IAC had all of the information needed to build an informed projection for the matching funds portion of the program's budget. We took the number of candidates who we anticipate will be qualifying for matching funds, and multiplied them by the amount of matching funds required for each campaign. That gave us the total amount of matching funds that the program should expect to distribute.
- **Other Costs:** The program will need to budget for the costs associated with personnel, facilities and internal service rates, and technology development. The personnel costs are based on estimates provided by the County's Human Resources division, and account for a Program Manager 1, Program Specialist Sr, and up to 4 on-call temporary employees, which is similar to the City of Portland Small Donor Election's previous staffing structure. The facilities and internal service rates are modest, and were based on estimates provided by the County's Facilities and Property Management division. The technology development and maintenance costs were based on an estimate similar to what Portland required in developing its own reporting software.



# IAC Recommendation: Programmatic Oversight

## Recommendation

1. The Public Campaign Finance program will report to an independent volunteer Oversight Commission
  - a. The commission will consist of 9 volunteers
  - b. Each member will be eligible to serve a maximum of 2 terms, of 4 years per term; a term may be less than four years if a member is nominated by a county commissioner and is serving the duration of the nominating commissioner's term
  - c. The County will strive to appoint members who have demonstrated an interest in campaign finance funding, and represent diverse interests, lived experiences, communities of concern, and geographic areas throughout Multnomah County
  - d. Applicants must disclose if they have ever been convicted of violating a local, state or federal campaign finance law in their application
2. The Oversight Commission shall be appointed through the following process:
  - a. The County will solicit applications from the public, in accordance with the County's processes for soliciting community engagement opportunities.
    - i. PCF staff will review the applications and develop a list of eligible individuals; all applicants who are eligible to serve on the Oversight Committee will be included on this list
    - ii. PCF staff will then submit the list of eligible individuals to both the Board of County Commissioners and the Oversight Commission.
    - iii. Selecting from the staff-provided list, the Board of County Commissioners will appoint 5 members to the Oversight Commission. Proposed members of the Oversight Commission must be nominated by a member of the Board during a public Board meeting. A Board member may not nominate an individual to the Oversight Commission if that member's seat is up for election in the current election cycle, however they are permitted to vote on the nomination. The full Board then votes on whether to approve the nominees. If a nominee secures appointment, then that individual's term(s) will align the terms of the Board members who nominated them. Selecting from the staff-provided list, the Oversight Commission will then nominate the other 4 members. The nominations must be approved by the Board.
    - iv. For the initial seating of the Oversight Commission during program implementation, all five members of the Board of County Commissioners shall be allowed to nominate members.
    - v. When a PCF Commission vacancy occurs:
      - With oversight from the current commission, the County will solicit applications from the public, in accordance with the County's processes for soliciting community engagement opportunities.
      - Staff will follow the same process identified above; if a vacancy is caused by the departure of a Board-nominated member, then the Board shall select a replacement from the list of eligible applicants; if the vacancy is caused by the

departure of a Commission-nominated member before their term has expired, then the Commission shall nominate a replacement from the list of eligible applicants and forward that nomination to the Board for approval.

- If a Board-nominated individual secures appointment, then that individual's term is the duration of the remaining term of the Board member who nominated them. They are then eligible to serve 2 full terms afterwards.

- b. Commission members will be appointed by the BOCC and serve 4 year terms starting March 1 of odd-numbered years, except that the initial appointments will be as follows:
  - i. Three of the initial appointees from BOCC nominations will serve terms from July 1, 2025 to February 28, 2027; and
  - ii. Two of the initial appointees from BOCC nominations will serve terms from July 1, 2025 to February 28, 2029
  - iii. Two of the initial appointees from the commission nominations will serve terms will serve terms from September 1, 2025 to February 28, 2027; and
  - iv. Two of the initial appointees from commission nominations will serve terms from July 1, 2025 to September 29, 2029
  - v. Members of the Commission are limited to a maximum of two full terms, except that members serving an initial term of less than 4 years may serve two subsequent 4 year terms. If a position is vacated during a term, it will be filled for the unexpired term.
3. All applicants must disclose potential conflicts of interests and any past convictions of violations of campaign finance law, and then recuse themselves in accordance with County policies on conflicts-of-interest. The following individuals are prohibited from serving on the oversight commission
  - a. Current elected officials from the County, City, State, Metro
  - b. Candidates for County office, their campaign staff, campaign consultants, or campaign contractors who are volunteering with or paid by a candidate running for a County office
  - c. Employees of Multnomah County
  - d. Immediate family members of candidates for County office, or immediate family of current County elected officials
  - e. County staff who reported directly to current or former County elected officials, including the Chair, County Commissioner, Sheriff or Auditor, or their Chiefs of Staff within the previous five years

Even though some individuals are prohibited from serving on the oversight commission, the IAC underscores that there should be a robust process for the program to engage community members, to gain their insights and feedback.

### **Administrative Rulemaking**

1. Unless already established by the County Code, in the County Charter, or by state or federal law, the PCF Oversight Commission will have the administrative rulemaking authority to:
  - a. Establish the contribution limits for program participants
  - b. Adjust match grant caps in the event of underfunding
  - c. Establish definitions for allowable in-kind donations
  - d. Establish practices around receiving complaints
  - e. Establish the program's timelines
  - f. Further define prohibited sources of contributions
  - g. Establish reporting requirements

- h. Establish rules for candidates switching races
  - i. Set criteria to determine when investigations are needed, and the manner of those investigations
  - j. Establish policies regarding penalties
  - k. Define permissible and impermissible uses of private contributions and matching funds (paying campaign debt, returning unused matching funds, etc)
  - l. Establish rules regarding paying fair market value
2. The PCF Oversight Commission will also be empowered to:
- a. Issue public recommendations around the program's funding needs
  - b. Issue public recommendations for any policy changes to the program's rules
  - c. Be consulted regarding the oversight of program staff by County leadership
  - d. Review the program's performance

The IAC felt strongly that should a situation arise where a majority of the County Board has a conflict of interest regarding a change to program rules, that the Oversight Commission should be delegated the authority to make necessary changes to the program rules in place of the Board. The IAC requests that during policy development, the County Attorney's Office explore how that authority may be delegated in that circumstance

#### Explanation

A significant concern with a government-run matching program is the potential for conflicts of interest. The IAC discussed that the threat exists for elected officials to attempt to undermine the program by interfering with their daily operations, specifically around penalty assessments, eligibility determinations, and the allocation of matching funds.

The best way to protect the program from actual interference or the perception of such interference is to provide for independent oversight. Establishing independence within matching programs is crucial to maintaining their credibility and ensuring unbiased decision-making.

The IAC recommended setting up an independent oversight commission. This commission would directly oversee the program, advise program staff, review program performance, adopt administrative rules and share policymaking authority with the Board. At the same time, the IAC sought to provide for a balance of power with the County Board. Elected officials are accountable to the voters and bear ultimate responsibility for the County's operations. The IAC strove to balance these two imperatives with this recommendation.

The structure of the proposed Oversight Commission mirrors that of the Portland Elections Commission, which oversees the City's Small Donor Elections program.<sup>12</sup> Four-year terms allow Commission members to oversee two election cycles, encompassing all covered offices. A membership of nine better ensures a quorum and prevents tie votes.

The appointment process is designed to balance power between the Board and the oversight commission while preventing the appointment of biased political allies. The process begins with an open application period, encouraging a diverse pool of applicants who represent different perspectives, experiences, and communities. Program staff, in consultation with the Oversight Commission, then develop a list of applicants who are eligible to serve. From this list, members of the Board nominate candidates, which are then voted on by the Board.

12 [2.16.130 https://www.portland.gov/code/2/16#toc--2-16-130-portland-elections-commission-](https://www.portland.gov/code/2/16#toc--2-16-130-portland-elections-commission-)

For five of the commission seats, the Board nominates from the list of applicants, provided those Board members are not up for election in the current cycle. This prevents potential appointees from influencing decisions to benefit specific candidates. The remaining four members are nominated by the current oversight commission, further safeguarding the commission's independence against conflicts of interest by ensuring that a significant proportion of Oversight Commission seats are filled by individuals who do not owe their seat on the Commission to the nomination of a current elected official. The terms will be staggered to ensure continuity of knowledge, with the Board-nominated members' terms aligning with the terms of the Board members who nominated them.

The IAC recommended restrictions on who can serve on the Commission to ensure expertise and diverse perspectives are present while avoiding conflicts of interest. The goal is to prevent individuals with vested interests in specific candidates from compromising the Commission's independence and credibility.

One of the most important recommendations that the IAC made is that the Oversight Commission should have limited administrative rulemaking authority over the program. Administrative rulemaking power allows for the oversight commission to be responsive to unforeseen circumstances, move quickly during an election, and help the program keep pace with changing dynamics in fundraising and the on the ground realities of campaigning. It allows for a balance of power with the Board, ensuring that the granular decisions about program operation and rules are made with independence. These enumerated powers are similar to those delegated to the Portland Elections Commission. These are rules that should be proscribed before the program launches, but do not need to be enshrined in the County Code.

The IAC recommended that the Commission's ability to advise and consult the Board on the program's needs, by issuing public recommendations for funding amounts and policy changes be enshrined in county code. These are critical to the program's success, and the Oversight Commission should have a protected right to have a voice in the process. The IAC also supported a provision around delegation of power in case of conflict of interest. The IAC discussed their concern for the potential of a situation to arise where a shifting legal analysis regarding whether elected officials who are running for office should be barred from voting on policy or funding decisions because of rules around conflicts-of-interest. If that situation arose at the County and the Board could not take critical votes on the program's policies, then it could derail the program. The IAC recommended that the County Attorney's Office explore a mechanism to allow for the temporary delegation of certain policymaking authority to the oversight commission, should the Board be prevented from taking a vote due to legal guidance about conflicts-of-interest.

Here is a table that shows which powers would be ascribed to the Board and which powers would be ascribed to the Oversight Commission:

<b>County Chair and Board</b>	<b>Oversight Commission</b>
Method of Distribution	Process for returning unspent matching funds
Qualification Thresholds	Process for candidates to apply and receive matching funds, validation process
Reporting Timelines	Content of the reports
Spending Limits	Further define what is allowed/prohibited
In-Kind Donation Rules	Further define what is allowed/prohibited, process for validating compliance
Match Grant Caps	Adjust only if program is underfunded
Set Program Budget	Recommend funding levels
Responsibilities, Membership, and Authority of Oversight Commission (such as: appointees, delegation of administrative rulemaking authority, structure)	Administrative Rulemaking, process for holding meetings, operations of Oversight Commission
Approach to Violations	Penalty amounts and sources, Process for receiving complaints and conducting appeals. Criteria for conducting investigations.
Program staffing	Advise on hiring and firing decisions
–	Program timelines
–	Rules for candidates switching races
–	Contribution limits
–	Methods of giving (cash, credit card, etc)

# IAC Recommendation: Match Grant Caps

## Recommendation

Candidate	Match Grant Caps
Chair	\$650,000
Commissioner	\$250,000
Sheriff	\$100,000
Auditor	\$50,000

## Explanation

Match grant caps are a critical component of matching programs. These caps serve as a financial control mechanism, limiting the amount of public funds that any single campaign can receive. That tool helps the program maintain its fiscal health and ensure its long-term financial sustainability. This approach aligns with principles of responsible fiscal management, preventing excessive expenditures and safeguarding the program's budgetary integrity.

The timely establishment of match grant caps, ideally enshrined in law, is of paramount importance. Clear and early communication of these limits to campaigns empowers them to engage in effective financial planning and strategic resource allocation. With a predetermined cap on matching funds, campaigns can construct realistic budgets and develop campaign strategies that align with available resources. This fosters transparency and predictability for participants.

It is crucial to emphasize that match grant caps do not encompass or limit the entirety of a campaign's financial resources. Rather, they exclusively pertain to the public funds disbursed through the matching program. Campaigns retain the autonomy to solicit and accept private contributions from individual donors and other sources, in alignment with local, state and federal laws. These private donations, in conjunction with matching funds, constitute the overall financial resources at a campaign's disposal. The coexistence of public matching funds and private donations underscores the multifaceted nature of campaign finance systems and the diverse avenues through which campaigns can secure resources.

## Methodology

The IAC developed these match grant caps by reviewing historical data and creating data-informed projections of campaign's likely financial requirements in future election cycles.

The total amount of resources that a candidate would need to run a robust campaign for Multnomah County's elected offices is based on a cost-per-voter methodology adjusted for anticipated voter registrations and inflation. Cost-per-voter identifies how much campaigns spend to win elections. It takes the total spent by a campaign and divides that by the total number of votes cast in that election. We used the total number of votes cast, because campaigns often base their communications, engagement, and budget on the number of people that they anticipate will vote in the upcoming election.

We specifically relied on the amount spent by campaigns before the contribution limits began to be enforced in 2021. That was an intentional choice, because at that time they were not constrained by the County's contribution limits and could campaign with a robust budget for staff, advertising, and other strategic expenses. Isolating this data identified the Total Need to effectively communicate with voters. Next we took the average amount that campaigns could raise after limits were adopted, which represented an estimate of what candidates were able to raise under the County's current contribution limits. We subtracted that from the Total Need and identified the delta between how much candidates could raise under the County's contribution limits and how much they need to communicate with voters. The gap was then rounded to a simpler figure. Along these lines, even though the data showed that candidates for different districts had different fundraising needs, the committee made the deliberate choice to choose one match grant cap for all Commissioner races. This reduces the potential confusion and enshrines simplicity into the recommendation.

Therefore, the match grant cap numbers are designed to help a candidate bridge the gap and raise enough funds to run a robust campaign.

# IAC Recommendation: Qualification Thresholds

This IAC recommendation had two parts. The first was about the preconditions a candidate must meet to qualify, which ensures that matching funds are going to candidates who follow the law, are running for County office, and are in competitive races that require more spending. The second part was about the thresholds candidates must meet to demonstrate community support and qualify for matching funds.

## Qualification Requirements Part 1

1. Candidates must turn in initial paperwork declaring that they are participating in the program.
2. The candidate and their treasurer must take required trainings, to be defined by administrative rulemaking.
3. Candidates must remain in compliance with the program's rules.
4. Candidates must be in a contested race, defined as there being at least one more candidate competing than the number of offices available.
5. Candidates must file a statement of candidacy.
6. Candidates must collect a certain number of donations to qualify.
  - a. A qualifying donor is defined as a unique individual who resides within the limits of Multnomah County, whose residency is verified pursuant to criteria established by the Program Manager, and who can legally contribute to campaigns under local, state, and federal law.
  - b. The donation must be at least \$5.

This section of the recommendation was grounded in the following principles:

### **Public Declaration of Intent:**

To participate in the Small Donor Elections program, candidates must formally declare their intent by filing the necessary paperwork with the program. This ensures that only candidates who have officially opted into the program are eligible for matching funds.

### **Contested Race Requirement:**

Matching funds are only available to candidates participating in contested races. This requirement ensures that matching funds are allocated to competitive races where candidates genuinely need financial assistance to run a viable campaign. It prevents the allocation of funds in uncontested races where the outcome is a foregone conclusion.

### **Mandatory Training:**

A requirement that candidates and their treasurers complete a training ensures that the candidates fully understand the program's rules and regulations. This minimizes the risk of violations, penalties, or misinformation being disseminated to the public. Additionally, it fosters a relationship of trust and open communication between program staff and candidates.



**Proof of Candidacy:**

Candidates must provide evidence that they are running for a County position by submitting proof of their filed statement of candidacy. This requirement confirms that public funds are only allocated to candidates who have formally declared their candidacy for a County office. If the program mandated that candidates qualify on the ballot to receive matching funds, they would be unable to access these funds until well into the cycle. This delay would significantly impede their ability to hire campaign staff, engage in strategic planning, and make necessary expenditures in a timely manner. By allowing candidates to receive matching funds as soon as they reach qualification status, the program empowers them to run more effective and competitive campaigns.

**Qualifying Contribution Requirements:**

To qualify for matching funds, candidates must receive contributions from unique donors who are residents of the County and are allowed to donate under federal, state, and local law. The program would develop a process for verifying contributions are eligible through administrative rulemaking. This would include most citizens and people with permanent residency status. This requirement signifies the prioritization of broad-based community support and ensures that candidates are responsive to the needs and concerns of County residents. This approach would be inclusive of more community members. The decision not to limit the definition of qualifying donors to registered voters reflects a commitment to engaging and representing all members of the community, regardless of their voting status.

Donations must be at least \$5 to qualify. This is similar to the City of Portland's rules. The intent is to ensure that candidates are truly demonstrating genuine support for their campaigns with a donation that signifies enthusiasm. If a candidate collects donations as low as a few cents or \$1, then those can easily be obtained by asking strangers in public and that does not prove that a candidate is embedded in the community—and is running a serious campaign.

The committee decided to not recommend a minimum age limit for a qualifying donor. The Small Donor Elections program does have a requirement that all donors be at least 18 years old. However, the IAC believed that there are many young community members who are deeply invested in our civic conversations and are impacted by the laws as much as people over 18 years old, and candidates should be incentivized to engage with them too. The program can also establish a process through rulemaking to require that donors affirm that the donations truly came from them and were made with their consent. The IAC emphasized that federal law already requires that donations from minors must be controlled by them and be made with their full consent, which prevents adults from passing a donation through a minor.<sup>13</sup> The IAC noted that the Oversight Commission should be cognizant of potential challenges for how campaigns report donor information from minors, and should establish a process to verify these individuals.

13 <https://www.fec.gov/help-candidates-and-committees/candidate-taking-receipts/who-can-and-cant-contribute/>

## Qualification Requirements Part 2

<b>Candidate</b>	<b>Minimum Number of Qualifying Donors (per grant level)</b>	<b>Qualifying Donor</b>
Chair	200–500–1000–1500	Unique Multnomah County resident
Commissioner	100–250–500–750	Unique Multnomah County resident
Sheriff	100–150–200	Unique Multnomah County resident
Auditor	100–150	Unique Multnomah County resident

Part two of the recommendation focused on threshold numbers. In nearly every matching program across the nation, candidates must raise donations from enough unique individuals in the jurisdiction to qualify for matching funds. This is designed to demonstrate that the candidate has popular support and is running a campaign with the ability to collect many small donations.

The threshold chart above shows the number of donors required for a candidate to advance to the next tier of matching funds grants. As discussed in the Method of Distribution section, when the candidate achieves the first number of donors, they will receive an initial amount of funds to help them “scale up their campaign”. And then the subsequent tiers provide a candidate with larger amounts of matching funds. We pointed out that the first tier should be lower than the average number of donors to a campaign. It took the full election cycle for candidates to reach the higher numbers of donors, and it would undercut a key benefit of the program if candidates would have to wait until the end of the cycle to get matching funds. Therefore the first tier is designed to allow campaigns to qualify for matching funds earlier in their efforts.

The threshold numbers were crafted based on historical anonymized data of five campaigns for Chair, twelve campaigns for County Commission, and two campaigns for Sheriff, with 17/19 of the campaigns occurring after the contribution limits were enforced beginning in 2022. The committee reviewed the average number of unique individual donors who lived in Multnomah County. The average number of these donors for Chair candidates was 280 for Chair (and 515 for those who advanced to the runoff), 257 for Commissioner candidates, and 112 for Sheriff candidates. The number of donors for Auditor candidates was not provided, however we understood that it would be closer to the Sheriff averages than any other type of race. This data is available in the report’s Appendix section.

Establishing the required number of donors was a delicate balancing act. If the threshold is too high, then it will be impracticable or impossible for most candidates to qualify for matching funds. A central value of the program is to ensure that candidates from all backgrounds have the opportunity to compete and engage residents, and that cannot be achieved if most candidates cannot qualify. However, if the threshold is too low, then nearly every candidate will receive matching funds. That is financially unsustainable for the program, and will result in taxpayer dollars going to candidates who do not seriously campaign for office. A candidate should have to put in real effort to earn matching funds. Matching programs should encourage candidates to engage more everyday people in our democracy. When more County residents are engaged, then more voices are brought to the table and more perspectives are heard. So the grant tier qualification numbers were designed to incentivize candidates to connect with more community members. The committee believes that the thresholds in the recommendation accomplished this delicate balancing act.

The committee's goal was to set a threshold number that is ambitious but achievable. While campaigns may have to rethink their fundraising approaches, they have a helpful model in the City of Portland's elections. 65 percent of candidates for council qualified for matching funds between the 2020 (number of candidates who participated<sup>14</sup> and qualified<sup>15</sup>) and 2022 cycles (number of candidates who participated<sup>16</sup> and qualified<sup>17</sup>). In 2024, 54 percent qualified for City Council and 63 percent qualified for Mayor.<sup>18</sup> While the IAC recognizes that the City elections tend to attract more donors than the County races, most City candidates were able to qualify because they adapted to the program requirements and focused on raising small donations from everyday people through house parties, canvassing, and online tools. We do believe that a serious candidate who is embedded in the community and runs a dedicated campaign can meet these thresholds.

Some programs require a minimum number of signatures to qualify for matching funds. The IAC decided not to include such a requirement in its recommendation. Signatures are designed to show support from community members, which is already achieved through collecting donations from qualified individuals and therefore would be a duplicative burden on the campaigns.

Finally, the committee discussed the possibility of requiring a certain number of donors live in the district of the candidate they are contributing to, if the candidate is running for County Commission. We recognized that some candidates may be tempted to spend most of their time fundraising outside of their district, and therefore are not connecting with as many of their would-be constituents. As seen in the appendix, much of the funds campaigns have historically raised do come from donors living in the more affluent parts of the county. However, there were a few reasons why we did not include this requirement in the recommendation. First, some communities have fewer resources to contribute, and/or less of a history donating to local candidates. And a district-based requirement would place an unfair burden on candidates from those communities. It may also put them at a disadvantage if third party organizations decide to spend heavily in their districts. Critically, it is important to note the unique challenges faced by candidates from historically-marginalized communities who run for office. Rising housing costs have redistributed minority communities throughout the County. And that makes it much more challenging for these communities to coalesce power within a district to ensure representation. If there was a district-based requirement, it may create unique obstacles for candidates from these communities to run and win. Finally, candidates do ultimately need to win the majority of votes from their districts to get into office, requiring them to actively campaign among voters in their districts. Residents of these districts do have final say on who represents them, and the IAC believed that a district-based requirement on qualification thresholds was not necessary to guarantee representation.

14 Pg 19 <https://www.portland.gov/sites/default/files/2021/oaec-report-8.5.2021.pdf>

15 <https://openelectionsportland.org/?startDate=Tue+Jan+01+2019+00%3A00%3A00+GMT-0800+%28Pacific+Standard+Time%29&endDate=Fri+Jan+01+2021+00%3A00%3A00+GMT-0800+%28Pacific+Standard+Time%29>

16 <https://www.portland.gov/smalldonorelections/all-about-2022-candidates>

17 <https://openelectionsportland.org/?startDate=Fri+Jan+01+2021+00%3A00%3A00+GMT-0800+%28Pacific+Standard+Time%29&endDate=Sun+Jan+01+2023+00%3A00%3A00+GMT-0800+%28Pacific+Standard+Time%29>

18 <https://www.portland.gov/smalldonorelections/all-about-2024-election>

# IAC Recommendation: Method of Distribution

	Tier 1	Tier 2	Tier 3	Tier 4
<b>Chair</b>	200 donors \$50,000	500 donors \$200,000	1000 donors \$200,000	1500 donors \$200,000
<b>Commissioner</b>	100 donors \$40,000	250 donors \$70,000	500 donors \$70,000	750 donors \$70,000
<b>Sheriff</b>	100 donors \$30,000	150 donors \$35,000	200 donors \$35,000	
<b>Auditor</b>	100 donors \$30,000	150 donors \$20,000		

*For purposes of qualifying for a tier, a donor is defined as a unique individual who lives in Multnomah County and donates at least \$5 to the candidate.*

## About the recommendation

The IAC has recommended that the County adopt a flat grant method for distributing matching funds. Candidates would access each grant by demonstrating public support, through reaching multiple tiers of individual, unique contributions.

The matching funds program is divided into different tiers, with four tiers for Chair and Commissioner races, three for Sheriff, and two for Auditor. This tiered system acknowledges the varying levels of competition and fundraising requirements for different positions. Chair and Commissioner races typically attract a larger pool of donors, candidates, and outside spending, which requires more matching funds to allow those candidates to compete and engage voters. Candidates for Sheriff and Auditor historically have a smaller number of donors, so should be allowed to access their matching funds with appropriate thresholds.

The allocation of matching funds across the tiers is designed to ensure that the total amount of available funds aligns with the recommended match grant caps for each position. The IAC has recommended match grant caps of \$650,000 for Chair candidates, \$250,000 for Commissioner candidates, \$100,000 for Sheriff candidates, and \$50,000 for Auditor candidates.

A core principle of the tiered system is to incentivize broader community engagement. By requiring candidates to secure contributions from a specific number of unique individual donors residing in Multnomah County to qualify for higher tiers, the program encourages candidates to actively reach out and involve more people in the democratic process. This approach helps foster greater participation in local elections. And it allows candidates to rely on many small donations from individuals, which can help reduce actual or perceived corruption.

The first tier is designed to provide early funding to candidates who demonstrate a serious commitment to their campaigns. The required number of donors for this tier is achievable based on historical data from recent elections. This early financial support enables candidates to establish a foundation for their campaigns by hiring staff, securing compliance and consulting services, renting office space, and implementing other essential campaign infrastructure.

As candidates progress through the tiers, the required number of donors increases, but this is also accompanied by higher matching fund amounts. This structure provides campaigns with the flexibility to adapt their fundraising strategies based on the specific dynamics of their race. In races with significant independent expenditure spending or heightened competition, candidates have the opportunity to secure additional matching funds to remain competitive.

The IAC set the qualification recommendations for the public campaign funding using historical data. We looked at anonymized donor information from 19 County campaigns between 2020 and 2024. This data guided us to establish thresholds that were ambitious yet achievable. You can find all the details on how we did this in the “Qualification Thresholds” section of the report.

Many candidates who campaign seriously for Chair, Commissioner, Sheriff, and Auditor should be able to achieve the first funding level. Historical data in the Qualification Thresholds section demonstrated that candidates would typically be able to reach the number of donors that we have recommended, although it will take an organized, focused approach to engage more County residents if candidates want to access the first grant earlier in their campaigns, or to access the larger grants in the other tiers.

We carefully calculated the funding amounts within each level to achieve the program’s goals. The first grant allocation should be enough to launch a campaign effectively, while also protecting the program from excessive disbursement to candidates who may not be able to grow their community support. If a candidate is able to attract more support, they are eligible for more significant resources. Financial support will then be available for candidates demonstrating robust community engagement.

The IAC believed that this policy would help the candidates succeed, be intuitive for campaigns and the public, provide enough matching funds to candidates without risking financial overexposure, and meet the program’s goals of encouraging candidates to engage more residents in our democracy and reducing corruption or the perception of corruption in local government.

## Explanation

In the United States, there are four primary methods for how programs distribute matching funds: flat grants, ratio multiple match, grants and match combination, and vouchers.<sup>19</sup> Each of these systems has its own unique advantages and disadvantages, and understanding them is crucial for developing the right policy for Multnomah County.

**Flat Grants:** This is the simplest distribution method, where a set amount is given to campaigns. Flat grants are smoother to administer and more equitable, though they may not incentivize additional effort or performance unless the grants are distributed in tiers.

**Ratio Multiple Match:** This system matches funds based on a predetermined ratio, encouraging recipients to continually fundraise. However, it takes more administrative capacity, is more challenging for the campaigns to succeed under, and is a less equitable approach.

**Grants and Match Combination:** This hybrid model combines a base grant with a matching component, offering a balance between support and incentive. It may offer a more nuanced approach to distribution, however it is more complex to administer and contains many of the challenges identified by the ratio multiple match policy.

19 <https://www.brennancenter.org/our-work/research-reports/guide-public-financing-programs-nationwide>

**Vouchers:** This method provides recipients with a voucher that they can then donate to the candidates. It is the most inclusive option because it removes a wealth barrier to a person's ability to donate, but it is more complicated and expensive to administer, and would create the most incongruity with other local matching programs, which can lead to public confusion.

These four methods share several key characteristics that ensure equitable distribution of funds, encourage community engagement, and maintain the integrity of the process:

### **1. Demonstration of Community Support**

Each method mandates that candidates showcase substantial community support by gathering a predetermined number of donations from unique individuals. This requirement ensures that candidates have a broad base of support and that the allocation of matching funds reflects the community's priorities.

### **2. Rigorous Evaluation and Compliance**

To maintain the integrity of the process, all methods require program staff to meticulously evaluate each donation to ensure it complies with the program's rules and regulations. This step helps prevent fraud and ensures that the matching funds are awarded fairly.

### **3. Promotion of Civic Engagement**

By requiring candidates to solicit donations from individual community members, all four methods encourage greater participation in the democratic process and reduce corruption or the perception of corruption in our government system. This grassroots approach fosters a sense of ownership and empowers residents to play an active role in shaping their community's future. This achieves several benefits, because it encourages resident-centered campaigns and shifts candidates' reliance to many small dollar donors, which helps reduce the perception of corruption for the public.

### **4. Stringent Oversight of Matching Funds**

To safeguard public resources, all methods have strict rules governing the use of matching funds. These rules ensure that the funds are spent appropriately and exclusively for their intended purpose, thereby maximizing their impact and preventing misuse.

The City of Portland, New York City and Los Angeles uses a ratio multiple match method. The IAC closely examined its suitability for County races. The inequities of this system that we identified raises concerns about its suitability in County-level elections. We conducted a thorough analysis of its implications before deciding not to recommend adopting this method.

In the following sections, we have delved deeper into each of these distribution methods, exploring their mechanics, benefits, and drawbacks in greater detail. Particular attention was given to the ratio multiple match system, dissecting potential implications for County races. This provided the IAC with a comprehensive understanding of these distribution models and their applications in various contexts.



# Method #1: Flat Grants

## How it works:

This method is the most straight-forward of the 4 policies. When participating candidates reach the predetermined threshold of donations, they become eligible for a substantial grant. This grant is uniformly distributed; every qualifying candidate receives an identical sum, irrespective of whether their donor base comprises predominantly small or large contributors. What is critical to understand is that it is the number of donors—and not the size of their donations—that allows the campaigns to access matching funds.

Candidates can request a grant each time they reach a tier. This reduces the number of times that campaigns must ask for—and staff must process—matching funds. But the grant amounts provide a significant and sustainable source of funding to support candidates for an extended duration.

Below is an illustration to visualize the concept, reflecting the IAC recommendation for Commissioner candidates. It shows that many small donations would unlock each tier of matching funds separately.



This method is used in jurisdictions such as Albuquerque, NM, Portland, ME, and the states of Maine, New Mexico and Connecticut.<sup>20</sup> There are two common types. A “clean elections” program is when a candidate only campaigns on the matching funds that the program provides, which is a finite limit. A “partial grant” program is where candidates keep both the funds they have raised from donors and the matching funds from the program. The IAC recommended a “partial grant” approach. Because candidates can keep both the private funds they have raised from individuals and organizations, and the matching funds from the program, they can raise more money to be competitive. This also reduces financial pressure on the program to adequately fund candidates.

20 <https://www.brennancenter.org/our-work/research-reports/guide-public-financing-programs-nationwide>

The adoption of a flat grant approach for matching funds brings forth a multitude of benefits, which ultimately led to its endorsement by the IAC:

- **Simplicity.** This approach is favored due to its simplicity and ease of comprehension for all stakeholders involved, including campaigns, organizations, and the general public. It also ensures a dependable and predictable stream of funding for candidates, as they have a clear understanding of the exact amount of matching funds they are entitled to receive. This predictability allows for better budget planning and strategic development.
- **Equity.** The flat grant approach fosters inclusivity by ensuring that candidates with a strong base of small-dollar donors are not disadvantaged. It incentivizes building a broad base of support by focusing campaigns on the number of donors, rather than the size of the donations. It ensures that a donor who can afford to give only \$5 can be prioritized as much as a donor who can give the maximum allowable amount. This empowers candidates from diverse communities to run competitive campaigns, regardless of their socioeconomic background.
- **Efficiency.** From an administrative perspective, the flat grant approach is remarkably efficient. It streamlines the process by eliminating the need to calculate matching amounts for each individual donation, which can be time-consuming. Additionally, it reduces the administrative overhead associated with processing numerous small deposits, as candidates only request matching funds upon reaching predetermined tiers instead of continually throughout the election cycle. This streamlined approach expedites the disbursement of matching funds, ensuring timely access for candidates.
- **Inclusivity.** The flat grant approach provides candidates with sufficient funds to scale up their campaigns early on, enabling them to expand their outreach and engage a broader audience. This, in turn, fosters democratic engagement by incentivizing candidates to actively involve more people in the political process. Encouraging candidates to run resident-centered campaigns helps to shift their reliance more towards small-dollar donors, which addresses the program's goal of reducing actual or perceived corruption.
- **Consistency.** While similar to the City of Portland's model, the tiered flat grant approach distinguishes itself by eliminating the ratio match component. This modification aligns with the IAC's commitment to maintaining consistency across jurisdictions while addressing the challenges associated with the ratio match system.

All methods have disadvantages, and these are the drawbacks of this approach:

- **Surplus constraints.** Candidates are more likely to meet their matching limits, so less money may be available at the end of an election cycle to rollover as a surplus. The IAC has addressed this by establishing tiers that are somewhat challenging to reach, so that candidates who do not need all of their matching funds will likely not reach the higher tiers because their race may be less competitive. Additionally, the IAC has recommended that the program adopt a requirement that candidates must return their unspent matching funds at the end of the election cycle, which allows for the program to maintain those funds for future use.
- **Spaced out payments.** If candidates can apply for multiple fixed grants, they have to wait to reach the next threshold before applying. The IAC has addressed this by providing enough matching funds with each grant to sustain the candidates for a significant period of time.



- Chance of misspending. The program could give a large amount early to candidates who do not actively campaign further than the point of first-tier qualification. The IAC has addressed this by setting the first tier at a level which is an achievable enough threshold that candidates could receive matching funds early and scale up their campaign, but is a relatively small portion of their overall match grant cap. If a candidate does not have the support or organization to proceed beyond the first tier, they will not get more matching funds.

The IAC recommended that the County adopt a tiered flat grant method. This is simpler to understand, more efficient to administer, easier for campaigns to work within, and more inclusive of candidates from all communities and backgrounds.

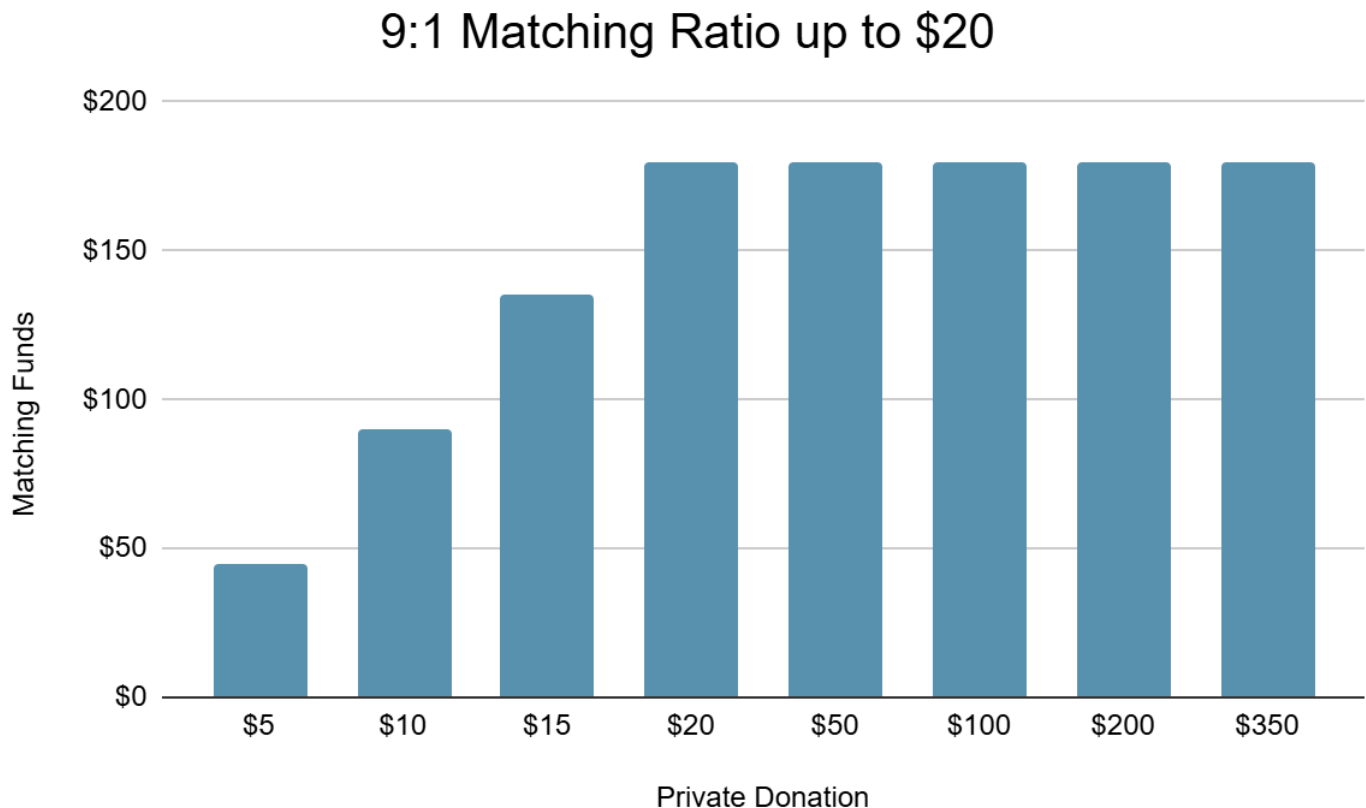
## Method #2: Ratio Multiple Match

### How it works:

Candidates collect a number of small donations from qualifying donors to demonstrate community support. When candidates reach the threshold and qualify, then all their donations below a certain amount are matched by the same ratio.

For instance, in the City of Portland's program, candidates cannot accept more than \$350 from a donor. But if that donor's contributions qualify, their aggregate donations below \$20 are matched on a 9:1 ratio. A \$10 private donation receives \$90 in matching funds, and a \$5 private donation receives \$45 in matching funds. If the private donation is over \$20, it is matched with \$180.

Here is an illustration to visualize the concept:



This method is used in Portland OR, New York City, and Denver, CO.<sup>21</sup> It is common, and is designed to focus campaigns on raising small donations. However, it has a meaningful number of drawbacks:

- **Inequity.** From a values perspective, the IAC had concerns about how a match would create disadvantages for candidates from low-income and underrepresented communities. Under a ratio, a larger donation generates a larger match and a smaller donation generates a smaller match. If much of a candidate's support comes from residents who can only afford to make small donations, that candidate will receive less in matching funds than a candidate with donors who can afford larger donations. The candidates with support rooted in low-income communities will fall further behind in their ability to run competitive campaigns. This creates a major barrier to access that is inherent in the policy's design.
- **Confusion.** A match ratio can be confusing for candidates, organizations, and the public to understand. Program staff reported that under the City of Portland's program, campaigns would often struggle to comprehend the contribution limit, the match limit, and how the ratio applied to different donation sizes, much less to easily communicate that to the public. This facet is opposed to the IAC's core value of simplicity and accessibility.
- **Unpredictability.** A ratio multiple match method creates an unreliable amount of funding for the campaigns. The matching fund distributions vary, because they are determined by how many qualifying donors a campaign has, which itself depends on whether those donors are verified residents and whether they have previously had their donations matched. When campaigns request matching funds for hundreds of donors at a time, they do not know how many of those donations will qualify for matching. It is up to the program staff to evaluate and calculate the matching funds based on the donor qualification criteria. County staff reported that in previous elections, the City of Portland's program would provide a matching amount that was different from the campaign's estimates. One of the IAC members who ran for City office under Portland's ratio multiple match program noted that he was rarely certain of how much matching funds he would receive in each deposit. That type of uncertainty creates challenges for campaigns, because they cannot confidently plan a budget or anticipate what they can pay for.
- **Inefficient administration.** Ratio multiple match programs require more staff assessments, which creates inefficiencies. County staff reported that the City's program would have to manually review each donation from a campaign and both verify the donor's residency and either confirm or determine the matching amount. Once that was finished, then staff would need to remove accidental overmatches and calculate the total matching funds that would be deposited into a campaign's account. The staff would have to run that process every time that a campaign requested matching funds, which they would often do if the campaign had qualified but not reached their match grant caps. Even with automation, this type of verification required a heavy level of staff involvement. The City of Portland's program had software<sup>22</sup> which automatically matched the donor to a person in the voter registration list. However, it failed to identify a portion of those records, necessitating manual verification. In addition, the program staff still needed to take the time to individually review the donation to make sure that the donor was not already matched to the \$20 limit and to determine the matching amount. Put simply, there is much more data to process. This inherent problem with ratio multiple match systems creates administrative inefficiencies, which delays matching fund payments to the campaigns. The IAC believes that this issue can be entirely avoided by utilizing a flat

21 <https://www.brennancenter.org/our-work/research-reports/guide-public-financing-programs-nationwide>

22 <https://openelectionsportland.org/>

grant system, because even though staff would need to verify residency, it would not need to calculate the matching amounts, as they are already established. Removing this step would reduce opportunities for errors and make the program more responsive to campaigns' requests for matching funds.

The IAC acknowledged several benefits associated with a ratio multiple match system, such as:

- **Rollover surpluses:** Funds that are not spent by candidates during an election cycle can be rolled over to the next cycle, promoting efficient resource management.
- **Continual deposits:** Candidates have the opportunity to receive multiple smaller disbursements of matching funds as they progress through their campaign at a steady pace, rather than receiving a single lump sum. This approach encourages consistent fundraising efforts and campaign activity throughout the election cycle.
- **Clear focus:** The emphasis on securing multiple small dollar contributors communicates to the public that the program is encouraging grassroots campaigning.
- **Reduces misspending:** The requirement for candidates to continually engage in fundraising efforts to receive matching funds serves as a safeguard against the misuse of public funds by candidates who are not actively campaigning. This mechanism ensures that matching funds are allocated to candidates who demonstrate a genuine commitment to their campaign and the electoral process.

After completing its analysis, the IAC believed that these advantages did not outweigh the identified disadvantages of the ratio multiple match method. The IAC therefore did not recommend that the County adopt a ratio multiple match program.

## Method #3: Ratio Multiple Match with Flat Grant

### How it works:

This method combines elements of a ratio multiple matching funds program with an initial, upfront grant provided to qualifying candidates.

When candidates qualify for matching funds, they receive a one-time, significant grant. This provides early funding to start their campaigns, covering expenses such as staff hiring, office space, and campaign materials. After receiving the initial grant, candidates' donations are then matched at a specified ratio (e.g., 5:1, meaning for every \$1 donated, the candidate receives an additional \$5 in public funds) up to a maximum limit. This incentivizes continued fundraising and amplifies the impact of each donation.

Washington, D.C uses this method. It provides a \$40,000 initial grant to qualifying council candidates and then matches subsequent donations at a 5:1 ratio up to the contribution limit.<sup>23</sup> San Francisco, CA and Santa Fe, NM also utilize the method.<sup>24</sup> There are advantages to combining the grant and ratio multiple match approaches:

- **Jumpstart:** The initial grant provides immediate funding, allowing candidates to “hit the ground running” and establish their campaigns early in the election cycle, potentially allowing newcomers and those without established fundraising networks to connect with residents and grow their campaigns

<sup>23</sup> <https://ocf.dc.gov/sites/default/files/dc/sites/ocf/publication/attachments/2020%20CampaignFinanceGuide.pdf>

<sup>24</sup> <https://www.brennancenter.org/our-work/research-reports/guide-public-financing-programs-nationwide>

- **Fundraising Incentive:** The ratio matching component incentivizes continued fundraising efforts, as each donation is amplified by the matching funds, encouraging candidates to engage with a broader range of voters.

However, the IAC noted that many of the same disadvantages of the ratio multiple match program exist in this method too. Inequities, administrative inefficiencies, unpredictability in the matching amounts, and confusion for the participants and the public (compounded by combining two methods into one) would be features of such a method.

Due to the complexity, administrative burden, and potential equity concerns, the IAC believed this method is not suitable for Multnomah County.

## Method #4: Vouchers

### How it works:

The method involves the program sending vouchers to every qualified resident in the jurisdiction. Residents can assign their vouchers to their preferred candidates, who then redeem them for matching funds. Vouchers are only redeemed once a candidate qualifies for the program, which requires the candidate to collect enough private donations or signatures from individuals.

This method is used in Seattle, WA,<sup>25</sup> which is the only jurisdiction that has implemented a voucher program. However, Oakland, CA will be implementing this method for its 2026 elections.<sup>26</sup> The vouchers method has many benefits, including:

- **Highest engagement.** Nearly all residents receive vouchers and can return them. In the 2023 Seattle municipal elections, the program mailed 502,332 vouchers to city residents and emailed another 19,000 residents with a digital version. Such a massive pool of potential donors generated comparatively-high engagement, with 30,649 residents returning 118,396 vouchers in that cycle.<sup>27</sup>
- **Removes an economic barrier to access.** Donors can contribute without using their personal funds. In Seattle's 2021 elections, the participation rate for voucher returns by income was closer to even. Although gaps in return rates by race and age persisted.<sup>28</sup>
- **Broader program education.** Residents learn about the program when they get their vouchers, which increases public utilization of the program.
- **Surplus rollover.** The program can draw upon matching funds that were not allocated in the previous election cycle.
- **Inclusive of candidates from low-income communities.** Candidates who are supported by low-income communities can raise enough to run competitive campaigns.

However, a voucher program has a number of glaring disadvantages:

- **Higher costs.** Voucher printing and distribution and more staff to review and process the vouchers drive up the costs. Seattle's 2023 report showed that administration for its 2023 municipal elections cost \$1.4 million,<sup>29</sup> whereas our estimations for future election administration (after the technology is developed) will be less than \$500,000.

25 <https://www.seattle.gov/democracymatchingvoucher>

26 <https://democracymatchingdollarsoakland.org/>

27 <https://seattle.legistar.com/View.ashx?M=F&ID=13951776&GUID=4D341D7B-E2E6-4497-A92A-C607B229AEA1>

28 [https://mccourt.georgetown.edu/wp-content/uploads/2022/08/Broadening-Donor-Participation-in-Local-Elections-Report\\_2022.pdf](https://mccourt.georgetown.edu/wp-content/uploads/2022/08/Broadening-Donor-Participation-in-Local-Elections-Report_2022.pdf)

29 <https://seattle.legistar.com/View.ashx?M=F&ID=13951776&GUID=4D341D7B-E2E6-4497-A92A-C607B229AEA1>

- **Confusion for the public.** The City of Portland's program is very unlike a voucher program. Putting two completely different models on the same constituency will pose major challenges for educating the public and candidates.
- **Administrative challenges.** The program would need to establish a process for verifying thousands of signatures and calculating the match amounts. Similar to the ratio multiple match method, this could add more administrative steps and delay the payments of matching funds.

The IAC supported the values of a voucher program. Engaging more residents in our democracy and reducing the economic barriers to access are important benefits and we appreciate Seattle's novel approach. However, the costs and the risk of public confusion would be too high to adopt such a method for Multnomah County at this time. For these reasons, the IAC did not recommend a voucher method.

## A Note about Consistency

The IAC did not recommend an exact replication of Portland's program for the County. Consistency has been one of the core values of our program. However, we did find that certain aspects of Portland's program would not be the right fit for Multnomah County.

While we acknowledge that our recommendation shares similarities with Portland's program, namely the tiered approach, there are key distinctions. Our recommendation offers a flat grant upon reaching each tier, whereas Portland offers a ratio multiple match upon reaching each tier.

To illustrate, Portland council candidates are required to secure 250 unique city donors to reach the first tier. At that point, all donations received and all future donations are matched at a 9:1 ratio until the match grant cap is reached. The matching would then pause until the candidate reaches the next tier of 750 donors, when the matching resumes until reaching that tier's cap. This process repeats once more if the candidate reached 1,250 donors.<sup>30</sup>

The IAC recognized the potential benefits of a tiered approach and sought to incorporate it into our recommendations. However for reasons discussed previously, we have proposed replacing the ratio match with a flat grant. We believe this modification will simplify the process for participating campaigns and enhance public understanding.

The IAC is committed to a synthesized approach to campaign finance that empowers candidates, campaign staff, organizations, and the public to achieve their goals. We are confident that our recommendation reflects this commitment and provides a clear and equitable framework for campaign financing in the County.

30 Section 2.16.070 <https://www.portland.gov/code/2/16>

# IAC Recommendation: Contribution Limits

## Recommendation

- An individual or qualifying organization can donate a maximum of \$350 to a participating candidate running for covered office. The intention is to align the contribution limits with those of Portland's Small Donor Elections program.
- A participating candidate may loan or donate a maximum of \$350 to their own campaign.
- There are no county-specific contribution limits for small donor committees, which should have the same definition and the same contribution limit that the state has for this type of organization.
- The contribution limits can be increased to a level that is compliant with state and local law by the oversight commission if the program does not receive adequate funding to provide the amounts designated in the match grant caps.
- The County should align its definitions with the state's definitions, particularly in terms of how the state defines donors, i.e. individuals, small donor committees, membership organizations, etc.
- The contribution limit would be automatically adjusted to inflation by the County at the beginning of every odd-numbered year.
- The Oversight Commission shall be empowered to establish the contribution limits for program participants.

## Explanation

Contribution limits are a vital component of a public matching program. They encourage candidates to seek smaller donations, aligning with the program's goals of reducing actual or perceived corruption. By limiting the amount of money that can be contributed, candidates are less reliant on large donations, which can create a perception of undue influence.

Furthermore, contribution limits foster a more democratic approach to campaigning. When candidates are limited in the size of donations they can receive, they must reach out to a broader base of constituents to raise enough funds to run a competitive campaign. This grassroots fundraising approach engages more residents in the democratic process, which makes our elections more inclusive.

Matching programs, being optional, have the flexibility to establish their own contribution limits. However, this flexibility is somewhat constricted by the County Charter. In Multnomah County, the Charter sets limits for individuals and qualifying organizations at \$500, adjusted for inflation to \$603.<sup>31</sup> In the City of Portland, the City Charter also sets limits at \$500, adjusted for inflation to \$613.<sup>32</sup> However, Portland's Charter includes a provision that exempts candidates participating in the City's matching program from these limits, which allows the Small Donor Elections program to set different contribution limits for its participants.<sup>33</sup> The Multnomah County Charter lacks a similar exemption, which means that policymakers can only establish limits that are lower than the Charter's limit, but not higher.<sup>34</sup> This legal constraint was a key factor considered by the IAC when making its recommendation.

31 <https://multco.us/info/campaign-finance>

32 <https://www.portland.gov/auditor/elections/campaign-finance>

33 Sec 3-304 <https://www.portland.gov/charter/3/3>

34 Sec 11.60 [https://multco.us/file/home\\_rule\\_charter\\_2022/download](https://multco.us/file/home_rule_charter_2022/download)



The IAC recommended that the future Oversight Commission be empowered to set contribution limits. The Committee noted the potential for conflicts-of-interest if members of the Board of County Commissioners voted on the size of the donations that they themselves could accept while running for office. The best way to avoid those potential conflicts and maintain the program's independence was to empower the Oversight Commission to set the limits.

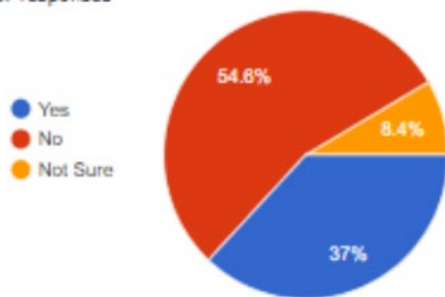
The IAC was balancing a number of factors. Members valued allowing candidates to raise enough in private donations to communicate with voters, pay staff, and operate a successful campaign. Especially when there are unlimited independent expenditures that can influence an election, candidates need resources to ensure that they are not drowned out by third party organizations. Members also valued incentivizing candidates to engage more everyday residents, which would address the public's concerns over potential corruption and perceived favoritism towards those who gave larger donations.

The Implementation Advisory Committee recommended a \$350 contribution limit for individuals, qualifying organizations, and the candidate to give their own campaign. They noted that the City of Portland had established a contribution limit that was lower for program participants than those who opted out of the program (the Portland program's contribution limits are \$350 for individuals and certain organizations, aside from a few exceptions).<sup>35</sup> To align with Portland and support consistency across matching programs, these IAC members supported a \$350 contribution limit for individuals and certain organizations.

The IAC believed that a lower limit would encourage candidates to reach beyond the traditional base of donors who could afford to give the maximum amount. This would foster a more inclusive democracy, which is a key benefit of the matching program. The program should reward candidates who successfully engage a socioeconomically broader population, by providing them the matching funds. If the limits were identical to those in the Charter, then the program would be providing matching funds to campaigns that did not make an intentional effort to reach out to these communities, but instead fundraised from a wealthier subset of the population who could afford to give larger donations.

#### IMAGE 10

Have you ever donated to a City candidate - Mayor, Auditor, City Commissioner - before 2019/2020?  
427 responses



To this point, a post-election analysis from the City's 2020 cycle found that 54% of donors who gave to a City candidate had never given before.<sup>36</sup> While there were multiple factors at play, the combination of lower contribution limits and matching funds helped bring many new donors into the campaigns.

Following the 2022 election cycle, Portland program staff found that the low-limits/matching combination had greatly increased the geographic distribution of small donors.<sup>37</sup>

35 2.16.040 Sec F <https://www.portland.gov/code/2/16>

36 Pgs 17-18 <https://www.portland.gov/sites/default/files/2021/oaec-report-8.5.2021.pdf>

37 Pgs 11-12 <https://www.portland.gov/smalldonorelections/documents/2022-portland-elections-commission-report-small-donor-elections/download>

The figure displays four maps of the City of San Jose, each representing a different scenario for the distribution of the amount per resident for the 97-2000 bond issue. The maps are arranged in a 2x2 grid, with the columns labeled 'MAYORAL CYCLE' and 'AUDITOR CYCLE', and the rows labeled 'BEFORE PROGRAM' and 'DURING PROGRAM'.

**BEFORE PROGRAM**

- 2016:** Shows a distribution where the majority of the city is in the lowest amount per resident category (\$0-0.25), with some higher amounts in the central and southern areas.
- 2020:** Shows a distribution where the majority of the city is in the lowest amount per resident category (\$0-0.25), with some higher amounts in the central and southern areas.

**AUDITOR CYCLE**

- 2018:** Shows a distribution where the majority of the city is in the lowest amount per resident category (\$0-0.25), with some higher amounts in the central and southern areas.
- 2022:** Shows a distribution where the majority of the city is in the lowest amount per resident category (\$0-0.25), with some higher amounts in the central and southern areas.

**Amount per resident**

- \$0-0.25
- \$0.26-1.00
- \$1.01-5.00
- \$5.01-10.00
- \$10.01-20.00
- More than \$20.00

## Minority Report

A key consideration behind this proposed limit was the need to allow candidates to raise enough funds for a competitive campaign and to rebalance the potential undue influence of independent expenditures. Campaigning is expensive, and candidates need to compete both with other candidates and with third party organizations seeking to influence the election through independent expenditures. When combined with the matching funds, a \$603 contribution limit would enable candidates to bring enough resources into their campaigns to effectively get their messages out to the public.



Several IAC members believed the higher limits would not discourage candidates from engaging more small donors. To receive matching funds, candidates would still need to engage a wider donor base than they traditionally have, according to the tiered system that the IAC recommended. In this way, certain members believed that the program's benefits could still be met without lowering the contribution limit. Additionally, candidates generally want to raise as much money as they can, which further incentivizes them to engage in efforts to raise many small donations.

These IAC members argued that the \$603 contribution limit established in the Charter was already a relatively-low limit, and that setting a lower limit for program participants would do little to accomplish the program's goals. They pointed out that the goal of limits is often to prevent mega-contributions in the tens or hundreds of thousands, or in the millions of dollars. They noted that those are the donations that are potentially corrupting, and felt that the goal of reducing actual or perceived corruption was already achievable with a \$603 limit.

### Additional Recommendations

The IAC made several additional recommendations. It recommended that candidates be limited in how much they could loan or give to their own campaigns. The IAC believed that the ability for candidates to loan or give their campaigns large amounts would remove the incentive for candidates to engage more residents in democracy.

IAC recommended that the program's contribution limits should not be applied to Small Donor Committees. These are organizations representing hundreds or thousands of people. And if many separate individuals want to pool their small donations to have impact, then it would be undemocratic to apply the same contribution limit to them that would apply to a single individual or organization. The state sets the small donor committee's contribution limits to \$5 times the number of donors to candidates running for the legislature, and those limits should be the limits for what these organizations can donate to County candidates.

The County Charter defines a small donor committee as an organization that collects donations of \$100 or less (which was adjusted to \$122 for inflation<sup>39</sup>) from individuals.<sup>40</sup> However, the state defines small donor committees as organizations that collect donations of \$250 or less from individuals.<sup>41</sup> The IAC recommended that the County seek to align the County's definition with the state's definition. This would eliminate potential contradictions, which reduces confusion and allows more organizations to follow the law.

The IAC recommended that the size of the contribution limit be automatically adjusted for inflation to keep pace with the rising costs of running for office. And it recommended that the oversight commission be empowered to raise the contribution limits if the program does not receive adequate funding to provide the amounts listed in its match grant cap recommendation. The City of Portland has a similar provision in its law.<sup>42</sup> This would allow program participants to offset the loss in expected matching funds with more private donations, which would enable them to still run a competitive campaign.

39 <https://multco.us/info/campaign-finance>

40 Sec 11.60 [https://multco.us/file/home\\_rule\\_charter\\_2022/download](https://multco.us/file/home_rule_charter_2022/download)

41 Sec 4 8A [https://www.oregonlegislature.gov/bills\\_laws/lawsstatutes/2024orLaw0009.pdf](https://www.oregonlegislature.gov/bills_laws/lawsstatutes/2024orLaw0009.pdf)

42 2.16.090 Sec C <https://www.portland.gov/code/2/16>

# IAC Recommendation: In-Kind Donations

## Recommendation

The committee's recommendation is based on the ability of the County public campaign finance program to establish its own policy on this topic. It identifies a key value of in-kind donations as increasing direct voter engagement. It also notes that the in-kind limits should be higher for participating candidates than non-participating candidates.

Membership organizations may make in-kind donations to candidates running for County office, under the following conditions:

- a. If a membership organization is donating staff time, the staff time is limited to activities that organize people including:
  - Direct voter contact
  - Community organizing
  - Community outreach
  - Staff support for direct voter contact, community organizing, and community outreach
  - Administrative support

*These items shall be further defined in the Administrative Rules, with the intent of maintaining consistency with other jurisdictions.*

- b. Membership organizations cannot donate staff time if the staff or members of the organizations are employed as pollsters, campaign consultants, or campaign strategists, or have been employed as such within the previous 18 months prior to the donation being made.
- c. The membership organization must be solely responsible for the pay, benefits, employment status and other human resources of every staff person or member of the organization facilitating contributions under this subsection.
- d. When donating staff time, membership organizations can donate up to an amount equal to 12 months full time staff equivalence (FTE).
- e. Membership organizations are allowed to donate the following items:
  - Transportation costs for up to \$2500
  - Food and beverages up to \$2500
  - Small gifts incidental to operation of the business up to \$1000
  - Office space that does not exceed 2500 sq feet and the lease is for less than 12 months
- f. Services or items that are not subject to the in-kind donation limits are:
  - Childcare and eldercare that is connected to the act of campaigning
  - Translation and interpretation services
  - Legal services connected to campaign finance compliance issues or in the campaign's defense during the violations' assessment process
- g. Campaigns can accept in-kind donations before and after they qualify for matching funds.

## Explanation

In-kind donations are a crucial aspect of a functioning democracy, providing campaigns with access to essential services and materials that would otherwise be financially unattainable, particularly for those operating with limited budgets. These donations can range from professional services to tangible goods, all of which can significantly enhance a campaign's ability to reach and engage voters.

Current regulations within the Multnomah County Charter, however, place restrictions on in-kind donations exceeding \$603, with exceptions for contributions from small donor committees or for a very limited scope of items. The IAC believed that those restrictions are too limiting and prevent organizations from meaningfully engaging with the candidates, and candidates from accessing these important materials and services. The IAC has therefore recommended a different approach for candidates who run under a matching program. However, it noted the recommendation is contingent on a change to either the County or the state's campaign finance law, which would allow for its recommendation to be implemented.

A guiding principle of the IAC in crafting the recommendation was aligning local and state policy and definitions. When it comes to a nuanced policy like this, the committee believed that matching the state laws would help reduce the type of confusion that either chills attempts to engage or sets up organizations and campaigns to accidentally violate the rules. The fewer distinctions between the State's and the County's in-kind donation policy, the easier it is for everyone to follow the law. Based on this reasoning, the IAC has recommended a policy that is close to identical to the state law.<sup>43</sup>

The IAC noted the in-kind donations rules in the City of Portland's Small Donor Elections program.<sup>44</sup> The complexities associated with the Small Donor Elections program may have created hurdles for organizations to make in-kind donations, with only 14 exceeding \$1000 made to participating candidates between January 2023 and January 2025 according to the Secretary of State's ORESTAR database.

The IAC's recommendation focuses the in-kind donations on activities that enhance direct voter engagement, a cornerstone of a healthy democracy. Furthermore, it stated that candidates participating in the public campaign finance program should be subject to higher in-kind donation limits than those who are not, as a further incentive for candidates to join the program.

The proposed policy prioritizes flexibility and accessibility. It encourages significant spending on voter and community engagement. Aligning with the State's rules, our recommendation says that these donations can be made through staff time, such as canvassing and community organizing. Specific material goods are allowed, such as transportation, food, and small gifts that are deemed to pose minimal risk of corruption due to their relatively low value, and are seen as essential to the day-to-day functioning of a campaign. The recommendation also recognizes the critical role of office space for campaign operations, and thus permits in-kind donations of office space. This is an important resource for a campaign, but it can be challenging for a campaign to find office space for a short term lease at an affordable rate.

Additionally, the policy removes limits on donations that enhance accessibility and assist candidates in complying with program rules, acknowledging the unique challenges faced by candidates from disabled, non-English language, and low-income communities.

43 Section 4-Section 5 [https://www.oregonlegislature.gov/bills\\_laws/lawsstatutes/2024orLaw0009.pdf](https://www.oregonlegislature.gov/bills_laws/lawsstatutes/2024orLaw0009.pdf)

44 Section 6 <https://www.portland.gov/smalldonorelections/documents/small-donor-elections-administrative-rules-3-14-2024/download>

The IAC sought to balance maintaining the integrity of the electoral process, simplicity in the rules to help campaigns avoid accidental infractions, and supporting a more accessible political landscape. The goal is to leverage in-kind donations to support genuine grassroots engagement and empower candidates to run competitive campaigns.

## Minority Report

Because the IAC did not have full consensus on the recommendation, several members requested that their views be included as a minority report. This only applied to one item in the recommendation: the fact that membership organizations can donate 1 FTE for up to 12 months staff equivalence (which includes salary, benefits, and any other expenses associated with employing the individual), specifically the 12 months provision. The IAC did achieve consensus on the rest of the recommendation.

The majority of IAC members supported the 12 months provision, because it aligned with the state law for consistency, and because it would allow membership organizations to meaningfully engage with the campaigns, especially since that engagement is limited to work that brings more individuals into the democratic process instead of advertisements, polling, or strategy development.

The minority believed that 12 months equivalence would constitute too large of a donation. The state law was designed to include contests that have a primary and a general election, which is a much longer timeline. Beginning in 2026, the County has eliminated its primary elections for County candidates and will have one election in November. The minority believed that 12 months was unnecessary because the County candidates would not need support for as long as a candidate who ran in a primary and general election. Furthermore, contested state elections often cost much more than the most expensive County races, and the 12 month equivalent limit was designed to encompass these much more expensive elections.

The minority also believed that if multiple organizations are allowed to donate up to 12 months equivalence, then those donations would constitute such a large part of the candidate's overall fundraising that it would circumvent the purpose of the program, which is for candidates to rely more on everyday individuals than large donors or organizations.

To address their concerns, these IAC members supported shortening the allowance to 2-3 months or 4-6 months.

# IAC Recommendation: Spending Restrictions

## Recommendation:

The IAC recommended that participating campaigns should be prohibited from using funds provided through this program for the following expenditures:

- Purchases of any item or service prohibited under state law
- Contributions to another candidate campaign, PAC, or ballot measure campaign
- Independent expenditures to support or oppose a candidate in a different race or a ballot measure
- Pay for travel outside counties adjacent the tri-county area (Clark, Cowlitz, Skamania, Hood River, Columbia, Tillamook, Yamhill, Wasco, Marion), meaning Multnomah, Washington and Clackamas
- Support for the candidate's attempt to seek nomination, election, or appointment to another office
- Paying loans, debts, penalties or fines in excess of \$5000
- Paying a consultant unless they are providing a bona fide service, charged at the fair market value
- Paying for attorney or accounting fees in association with appealing a penalty issued by the public campaign financing program
- Paying a salary or an un-reimbursed payment to a family member
- Purchases of gifts other than items with a de minimis value
- Making payments in cash or with gift cards
- Donating to a non-profit, unless in specific circumstances as defined in administrative rules, such as to attend a reasonably-priced event for campaign purposes
- Purchases of any vehicle-related expense, unless that expense is for costs associated with reimbursed mileage, parking, rideshare, and/or transit
- Paying any costs associated with conducting a recount
- Paying a post-election bonus to a staff member or a campaign consultant, unless that bonus was agreed to in writing before the election
- Paying costs associated with challenging another candidate's ability to qualify for the ballot or qualify for matching funds
- Paying costs associated with carrying out the official duties of an elected official
- Paying for an item or service from a provider where the candidate is employed, or has an ownership stake in the case of a privately-held company
- Paying to rent office space that the candidate owns, or the candidate is employed or has an ownership interest in a privately-held company
- Paying to rent an office space in the candidate's home

The IAC also recommended that unused matching funds should be required to be returned to the program after the election cycle has concluded.

### Explanation:

Matching programs are designed to broaden our democracy, reduce actual or perceived corruption, and to ensure that more people have a voice in our elections. But those matching funds are provided by Multnomah County taxpayers. Taxpayers trust the County to use their money wisely and reduce wasteful spending. The IAC believed that the best way to ensure that the program is careful with taxpayer funds is to adopt spending restrictions.

Spending restrictions are a helpful tool to ensure that the matching funds are used for legitimate campaigning activities to grow our democracy, and are not misspent or used for personal enrichment.

The experiences and challenges faced by Portland's Voter-Owned Elections program (2005-2010) offer valuable lessons that should be carefully considered and applied to this potential program.<sup>45</sup> Portland's first attempt at public financing was undercut by prominent stories about how a candidate funneled the matching funds to her family instead of using them to legitimately campaign. The lesson was that stringent regulations must be adopted to explicitly prohibit candidates from utilizing matching funds for personal enrichment or engaging in activities that could bring disrepute to the program. The IAC believed that these regulations should be comprehensive and unambiguous, leaving no room for misinterpretation or exploitation.

The IAC recommended explicitly prohibiting matching funds from being used to personally enrich a candidate and their family members, or their campaign team beyond the typical costs for their services. Aside from waste or misuse, this committee emphasized that the benefits of matching funds are to allow candidates from underrepresented and economically-disadvantaged communities to run competitive campaigns, support candidates in their attempts to share different perspectives and values with the voters, encourage campaigns to engage more everyday people in our democracy, reduce corruption and the potential for the perception of corruption, put Multnomah County residents at the center of these campaigns, and enable competitive elections that enrich the civic conversation. The IAC believed that matching funds should not be granted unless they are used for these purposes. Therefore, the IAC recommended prohibiting matching funds from being funneled to campaigns, entities, or causes that the participating candidate's donors did not donate to, being used to reduce competition by preventing candidates from qualifying for the ballot or the program, or used to obstruct the ability of the program to enforce its rules.

At the same time, the IAC recognizes that a delicate balance must be struck between preventing misconduct and fostering innovation within the electoral process. While regulations are necessary to curb potential abuse, they should not stifle creativity or hinder legitimate campaign strategies. Spending rules must still allow participating candidates to succeed.

It is critical to note that these restrictions mostly apply to the matching funds. As long as they are complying with local, state, and federal law, candidates are free to spend the private donations that they have raised to benefit their campaigns. The spending limits are meant to best protect taxpayer dollars.

45 <https://my.willamette.edu/site/law-journals/pdf/volume-49/49-4-diller-me-format.pdf>

The IAC also recommended that the candidates be required to return unused matching funds after the election has concluded. Most often, campaigns spend nearly all of the money they have raised during the election, to better position their candidates to win. But if campaigns still have matching funds after the election that are not necessary to fulfill vendor agreements, then the candidates will not need them for the purpose they were intended for. Portland's program requires that candidates return the unused matching funds within a certain deadline, and the IAC supported adopting such a recommendation.<sup>46</sup>

The IAC considered the existing expenditure limits established in the City of Portland's Small Donor Elections program.<sup>47</sup> The committee sought to find consistency and alignment with that program's approach, to avoid confusion among campaigns, organizations, vendors, and the public. New regulations or guidelines pertaining to matching funds should be harmonized with the Portland program's rules to create a cohesive and coherent regulatory framework. The IAC then added the provisions about prohibiting matching funds from being used to prevent a candidate from qualifying for the ballot or the program, carrying out the duties of an elected official, and paying to rent office space in a candidate's home, to further ensure that the matching funds were not being misspent or for personal enrichment.

46 2.16.100 <https://www.portland.gov/code/2/16#toc--2-16-100-return-of-city-matching-funds->

47 2.16.080 <https://www.portland.gov/code/2/16#toc--2-16-080-use-of-contributions-> and Section 8 <https://www.portland.gov/smalldonorelections/documents/small-donor-elections-administrative-rules-3-14-2024/download>



# IAC Recommendation: Violations & Penalties

## Recommendation

Goal: It is critical that the program takes necessary steps to ensure taxpayer funds are used responsibly, and that candidates follow the law. The program needs a process to issue penalties in case a violation occurs. But the purpose of the program is not to punish candidates or exact high penalties. The program staff should prioritize establishing trustful communication, educating those parties involved, and providing ample opportunities for campaigns and parties to fix mistakes. The program should only move to penalizations if the violation was not resolved by the campaign committee, or the violation is particularly egregious, as determined by program staff through consultation with the Oversight Commission.

If program staff identifies the potential violation, the program staff will follow the below procedure:

1. Program staff will contact the campaign committee or its treasurer to request more information, ask for clarifying details, and/or encourage the campaign committee to rectify the violation within the cure period\*. The goal is to open communication more than penalize campaigns.
2. If the program staff still believes that a potential violation occurred and that it was not fixed immediately, staff should contact the campaign committee to remind them about the cure period and explain the potential consequences of not curing a violation within the allowed timeframe. If the potential violation is particularly egregious, staff should communicate that an investigation may occur.
3. If the potential violation was not addressed within the cure period, the office will initiate an investigation. It will then assess a penalty\*\* based on the investigation's findings, and then issue the penalty decision to the campaign committee.
4. The campaign committee may pay the penalty, formally ask the program to reconsider based on additional information, or appeal the decision through the legal process, which will be later described in administrative rulemaking.

The oversight commission shall establish through administrative rules a timeline and a process for receiving both complaints and tips:

- The process should establish a resolution timeline for all complaints.
- Complaints may only be filed by candidates running for the same position, or their campaigns.
- Tips may be filed by any individual. This process will not have an established resolution timeline, but staff are instructed to provide a thorough response in a reasonable time period.

The Board of County Commission should explore a possible memorandum of understanding or an intergovernmental agreement on enforcement with the Oregon Secretary of State Elections Division.

\*The "cure period" means 30 days from notification of the incident and then 7 days if the notification occurred within 42 days before the election. The cure period starts when the campaign is notified.

\*\*The exact penalty amounts—and what can be paid with campaign funds—will be established by administrative rulemaking



## Explanation

The program must have a clear policy for identifying and addressing violations, including a structured system for assessing penalties. However the IAC recognized that violations may occur unintentionally due to the complexity of the rules and the often limited administrative resources of participating campaigns. These campaigns frequently operate with small teams and tight budgets, making it challenging to ensure every transaction adheres perfectly to the program's requirements.

The IAC firmly believed that the program should exercise caution when penalizing campaigns for accidental violations. Over-penalization can have harmful effects on both the program and the participating candidates. It can drain valuable resources from campaigns that already operate with limited budgets. These resources enable voter communication and engagement, which can cause broader democratic participation.

Furthermore, over-penalization can strain the relationship between program staff and campaigns. The ideal relationship should be built on trust and open communication. A punitive approach can foster an adversarial dynamic, hindering collaboration and undermining the program's credibility with stakeholders and the public.

Excessive penalties can also discourage potential candidates from participating in the program. The fear of incurring substantial penalties for inadvertent errors may deter candidates from engaging in key campaign activities or even from joining the program altogether.

Public disputes over penalties and violations can also shift the public narrative away from the program's core values of democracy and inclusivity. Instead of focusing on the positive aspects of the program and its potential to enhance democratic engagement, the public's attention may become fixated on stringent rule enforcement and punitive measures.

The IAC strongly advocates for a proactive approach centered on education and communication. Program staff, as the experts on the program's policies, should prioritize assisting campaigns in maintaining compliance by providing clear, timely, and responsive guidance to their inquiries. By offering upfront guidance, program staff can help participants navigate the complexities of the program, which then reduces the need for expensive legal counsel, or campaigns avoiding certain activities due to fear of non-compliance, and encourages the open and prompt reporting of potential violations.

While violations inevitably occur, and penalties remain a necessary tool for ensuring compliance and safeguarding taxpayer funds, the emphasis should always be on fostering a collaborative environment where education and communication are prioritized. By adopting this approach, the program can better achieve its goals of promoting democratic participation, supporting candidate engagement, and maintaining public trust.

The IAC recommended adopting a similar approach to that of the City of Portland's Small Donor Elections program,<sup>48</sup> which is to focus on education and communication. It also recommended adopting a Cure Period, which allows campaigns to resolve the issue within a certain timeframe and avoid paying the penalty. County staff identified that under Small Donor Elections, the campaigns would in most cases correct the mistake when alerted to it within that Cure Period. These corrections would commonly be refunding donations that were over the contribution limits, paying for items that were wrongly given as an in-kind donation, and updating missing or incorrect

48 <https://www.portland.gov/code/2/16#toc--2-16-160-penalties-revocation-of-certification-and-repayment-of-funds->

information on their reports. These were mostly unintentional errors that were easily rectified. The program would then have achieved its goal of educating the campaigns on how to avoid the issue in the future, and ensure that the campaigns are complying with the program's rules.

The IAC recommended that the program through administrative rules develop a specific timeline for reviewing and ruling on official complaints. A concise timeline allows for the candidate who is the subject of the complaint to be able to fully resolve a violation if one is identified, instead of having to wait weeks or months for the program to issue its findings. That timeline should be defined in the program's administrative rules. However, the IAC recognized that the complaints process is vulnerable to exploitation, because campaigns and their allies can weaponize the process to generate negative headlines about their opponents, even if the complaints are spurious. And if every complaint by any individual or organization had to be resolved in a specific timeline, the process could overwhelm staff capacity. The Portland Small Donor Elections program addressed that by requiring that official complaints may only be filed by other candidates, because the fact that a candidate would have to "stand by" the complaint would disincentivize the weaponization of the process.<sup>49</sup> The IAC made a similar recommendation for these reasons. But the recommendation would still allow any member of the public to send the program staff a tip about a potential violation. This would not overburden staff capacity because a tip would not have a defined timeline.

The IAC also recommended that the Board of County Commissioners explore a possible memorandum of understanding or an intergovernmental agreement with the Oregon Secretary of State's Elections Division around enforcement. If the Elections Division were able to enforce the program's rules, that would both alleviate a major burden on staff capacity and align the adjudication process with the State's process.

As to the penalties, the Multnomah County Charter states that civil fines must be between twice and twenty times as large as the unlawful violation.<sup>50</sup> However, the program would have latitude to assess the penalty amounts and other relevant rules within those Charter parameters. The Portland City Council delegated that authority to the Independent Portland Elections Commission, which has developed a series of penalties based on the type of violation.<sup>51</sup> The IAC recommended a similar approach for the County's matching program. This would align with the value of the balance of power between the Board and the Oversight Commission. It would also allow the program to be responsive and adjust quickly if an unintended consequence is found.

49 Sec 15 <https://www.portland.gov/smalldonorelections/documents/small-donor-elections-administrative-rules-3-14-2024/download>

50 Sec 11.60.4 [https://multco.us/file/home\\_rule\\_charter\\_2022/download](https://multco.us/file/home_rule_charter_2022/download)

51 Sec 18 <https://www.portland.gov/smalldonorelections/documents/small-donor-elections-administrative-rules-3-14-2024/download>

# IAC Recommendation: Reporting Timeline

## Recommendation

Participating candidates must report contribution and expenditure transactions to program staff using the same timeline as candidates are required to report contribution and expenditure transactions to the Oregon Secretary of State's office, which is:

- Once every 30 calendar days after the contribution is received or an expenditure is made;
- Once every 7 calendar days after the contribution is received or an expenditure is made, during the period beginning 42 calendar days before the election.

## Explanation

A matching program will need to develop a mechanism for staff to review the contribution and expenditure transactions of participating candidates. Matching programs often have their own unique rules around the sizes and sources of contributions, and permissible and impermissible expenditures of matching funds. Program staff must also evaluate whether a candidate has raised enough donations from qualified donors to receive matching funds. The most efficient and thorough way that the program can accomplish these tasks is to enable the staff to review donation and expenditure records from participating candidates.

Some of those records are available to the public through the Oregon Secretary of State's ORESTAR software. In an ideal setting, the matching program's staff could access the records through ORESTAR, which would reduce the reporting burden placed on campaigns. However, the state's website only reports individual records for donations and expenditures above \$100. Any transactions under \$100 are aggregated as "Miscellaneous". And in the case of donations, the key donor information (name, address, method of giving, etc) is not available. The program staff cannot use that data to evaluate whether a campaign is complying with the program's rules, or validate whether the campaign has enough qualifying donors to be eligible for matching funds. Until a solution is found that would allow for the program to review all transactions from a participating candidate's campaign in ORESTAR, the campaigns must be required to report that information directly to the program.

The IAC recommended that the campaigns be required to submit those transaction reports to the program along the same timeline that is required by the state. The state requires campaigns to report the transaction within 30 days after receiving the donation or making the expenditure. When the reporting period begins 42 days before the election occurs, the campaigns must report the transactions within 7 days.<sup>52</sup> Portland's Small Donor Elections program requires campaigns to submit their reports along the same timeline that they are required to submit to the Oregon Secretary of State's office.<sup>53</sup> The IAC believed that with this requirement, County program staff would still be able to identify a potential violation quickly and seek a remedy.

The IAC valued reducing the reporting burdens on campaigns and the risks for confusion. It therefore recommended aligning the reporting timeline with both the State and the City of Portland's requirements.

52 ORS 260.057 [https://www.oregonlegislature.gov/bills\\_laws/ors/ors260.html](https://www.oregonlegislature.gov/bills_laws/ors/ors260.html)

53 2.16.140 <https://www.portland.gov/code/2/16#toc--2-16-140-additional-reporting->

# Multnomah County Charter Constrictions

Amendments to the Multnomah County Charter that were ratified by voters in 2016<sup>54</sup> introduced a series of regulations aimed at enhancing transparency and fairness in County elections. These regulations encompassed contribution limits, spending limits, and disclosure requirements for candidates vying for County office. While the spending limits were subsequently overturned in the courts, the contribution limits and disclosure rules remain in effect and are currently enforced by the County Elections Division.

These contribution limits are set at \$603 (adjusted regularly for inflation) for both individual donors and qualifying organizations. Small donor committees are exempt from these limits, provided that they adhere to the rule of not accepting contributions exceeding \$122 from individual donors. The disclosure rules mandate that both campaigns and independent organizations publicly disclose information regarding their principal donors on their campaign materials.<sup>55</sup> This measure is intended to foster transparency and empower voters to make informed decisions based on a comprehensive understanding of the financial backing behind each candidate or organization.

The Charter places a number of constrictions on which rules a County public financing could implement. Such a program could not allow for the candidates to donate or loan themselves a larger amount than the current contribution limit to cover initial startup costs, and could not adopt in-kind donation rules that allow organizations to give meaningful support to a candidate. The Portland Small Donor Elections program has adopted these rules because the Portland Charter has a provision allowing public financing participants to follow the rules of the program instead of the rules of the Charter.<sup>56</sup> This has given the City's program more flexibility to implement policies that work along with the rest of their rules. However, the County Charter has no such exception language.

Furthermore, the program might not be able to adopt a definition of small donor committees that aligns with the state's definition. IAC members expressed concern that that incongruence may lead to confusion and challenge the ability of community organizations to remain in compliance. It is also possible that the disclosure rules in the Charter would require participants in the County's public financing program to list the County as a "donor", because candidates are required to list information about their top donors on their campaign materials, and the largest amount of funds a participating candidate would receive would be from the County's program. This was likely not the intention behind the 2016 Charter Amendment because it does not serve the goal of transparency and reducing potential corruption, so the IAC asked that the County Attorney's Office clarify this point.

The IAC discussed several options to address these concerns. It did not reach consensus on an approach, however it wanted the Board to consider the different proposals that the IAC reviewed. So the Committee instructed staff to include the top options in this report.

54 [https://multco.us/file/update\\_17\\_-\\_final\\_official\\_summary\\_results/download](https://multco.us/file/update_17_-_final_official_summary_results/download)

55 <https://multco.us/info/campaign-finance>

56 Sec 3-304 <https://www.portland.gov/charter/3/3#toc-section-3-304-coordination-with-public-funding-of-campaigns->

# Option #1: Charter Amendment Referral with PCF Exception Language

The Board could opt to refer a Charter Amendment to the voters. This amendment would incorporate exception language that mirrors the provisions found in Portland's Charter.

Sample language:

*A candidate participating in a government system of public funding of campaigns may receive any amount that such system allows a participating candidate to receive, and that matching dollars do not need to be included on advertisements.*

Advantages:

- **Alignment with Portland's Charter:** This approach creates consistency between the County and City charters regarding campaign finance regulations, potentially simplifying the legal landscape and public understanding.
- **Straightforward:** The approach is direct, and aligns the language with an existing model.
- **Policy-Neutral Charter:** By focusing on exception language, this option avoids embedding specific policy decisions in the Charter, which allows for nuanced policies to be crafted by statute.
- **Community Support:** Aligning with Portland's Charter could garner broader community support for a public campaign finance program, as it reflects an established and accepted framework and does not alter the campaign finance rules that were already approved by the voters.
- **Program Autonomy:** This option preserves the autonomy of the County's public campaign finance program, which can adapt its rules and be responsive to the needs of local communities.
- **Alignment Flexibility:** The program retains the ability to align its rules with either State or City regulations as deemed appropriate, ensuring compatibility and responsiveness.

Disadvantages:

- **No Change for Non-Participants:** This option does not address or alter the rules for candidates who choose not to participate in the public campaign finance program. They would still abide by the current rules in the Charter.
- **Alignment Not Guaranteed:** While the option allows for alignment with state regulations, it does not guarantee it. Alignment would depend on the support and action of both the Board and the Oversight Commission to modify the program's rules accordingly. If the public campaign finance program adopted definitions that mirrored the State, it would still mean that the definitions for non-participants would be incongruous with the other definitions, which could lead to confusion.

## Option #2: The County seeks State Alignment to Override Charter Restrictions

This option proposes that the Board advocate for the State Legislature align the County's campaign finance rules with the State's rules. This State law would effectively override certain campaign finance requirements in the County Charter. The County would also advocate that the public campaign finance program be able to establish its own rules on certain policies without amending the Charter.

This State law would effectively override certain campaign finance requirements in the County Charter. The County would also advocate that the public campaign finance program be able to establish its own rules on certain policies without amending the Charter.

### Advantages:

- **No Ballot Referral Needed:** This option avoids the complexities and uncertainties of a ballot referral process, saving time and resources.
- **Consistency with State Rules:** Aligning with state rules promotes consistency and reduces the potential for confusion in definitions and regulations for stakeholders.

### Disadvantages:

- **Potential Mismatch with County Needs:** Statewide campaign finance rules may not always be the most appropriate for Multnomah County candidates and elections. The state legislature may adopt policies that, while suitable for the state as a whole, could have unintended negative consequences for the County's public campaign finance program.
- **Higher Contribution Limits:** State policy could raise contribution limits beyond what some stakeholders in Multnomah County consider appropriate. This could reduce participation in the public financing program, as candidates might find it easier to raise funds outside the program or feel less need to engage with small donors.
- **Loss of Local Control:** While state alignment has advantages, it could also limit the County's ability to adapt its campaign finance laws to local conditions and the needs of its communities.

## Option #3: Charter Amendment Referral with PCF Exception Language and Higher Limits for Non-Participants

The Board could opt to refer a Charter Amendment to the voters. The amendment would include language that creates exceptions similar to those found in Portland's Charter. It would also tie the contribution limits for non-participating candidates to those of state legislative candidates, which currently is \$3,300<sup>57</sup> for individuals and a range of limits for different organizations.

### Advantages:

- **Similar Advantages to Option #1:** Like that proposal, this option would allow for alignment with Portland's Charter, keeps the Charter policy-neutral, allows for program autonomy, and enables the public campaign finance program to seek its own alignment with state and city law.
- **Flexibility for Non-Participating Candidates:** This option allows candidates who choose not to participate in the public campaign finance program to raise larger donations. The language of the amendment could be crafted to align with existing State law, providing consistency and clarity.

### Disadvantages:

- **Loss of Local Control:** Tying the county's rules to State contribution limits could result in less local control. The State's limits may not always be appropriate for Multnomah County candidates, and changes at the State could have unintended consequences for the County's elections.
- **Disincentive for Small-Dollar Donors:** If contribution limits are set too high, candidates may be less inclined to focus on small-dollar donors. This could reduce participation in the public campaign finance program, which is to encourage broad-based engagement and reduce the influence of large donors. A decline in program participation would weaken the program's effectiveness and limit its impact on the electoral process.

57 Sec 4 C2 <https://olis.oregonlegislature.gov/liz/2024R1/Downloads/MeasureDocument/HB4024/Enrolled>

## Option #4: The Board does not Seek to Amend the Charter or Align County Rules with State Law

The Board would take no action. It would not refer a Charter Amendment to the voters, and it would not advocate for the State Legislature to override the County's existing campaign finance rules.

### Advantages:

- **Minimal Board Effort:** This option requires the least amount of time and effort from the Board, allowing them to focus on other priorities.
- **Upholds Voter Decision:** It maintains the campaign finance rules that were approved by a large majority (88%) of voters. While a referral would ultimately let voters decide on a new policy, this option respects the initial decision made by the electorate.

### Disadvantages:

- **Unresolved Charter Issues:** This option does not address the concerns about potential conflicts or restrictions within the County Charter related to campaign finance regulations. The challenges mentioned earlier in this section would remain.
- **No State-Level Action:** By not advocating for State intervention, the County's campaign finance rules would be inconsistent with state law, which could lead to confusion, especially for in-kind donations and the definition of small donor committees.
- **Potential for Future Challenges:** Maintaining the status quo could leave the County vulnerable to future legal challenges or initiatives seeking to change the campaign finance rules. The IAC acknowledges that all of these options retain the possibility of a legal challenge, but has identified this option as the most potentially vulnerable to a legal challenge.



# Conclusion

The Multnomah County Public Campaign Financing Implementation Advisory Committee and its subcommittees met 28 times over the course of 5 months. Between December 2024 and April 2025, it crafted recommendations on these 10 topic areas: Budget and Funding, Programmatic Oversight, Method of Distribution, Qualification Thresholds, Match Grant Caps, Contribution Limits, Spending Limits, In-Kind Donations, Violations & Penalties, and Reporting Timelines. Every recommendation was informed by research and data analysis, and was deeply vetted by our members. The Committee members drew on a wide range of professional and personal experiences, policy knowledge, and understandings of the needs of different communities. In doing so, it has crafted a public financing policy package that is tailor-made for Multnomah County. We are proud of our efforts.

It was hard work. But each of us dedicated the time, energy, and capacity because we believed this topic was important. The IAC was honored to have the opportunity to build such a fundamental reform measure for the Board of County Commissioners to consider.

Public financing is the future. Money in politics has often been a barrier for everyday people to engage in their elections. It has corroded the public's trust because of the widespread perception of corruption. But such a program can be transformative. Public financing is a time-tested policy that is both sensible and impactful. Across the country, we have observed the ways in which it has changed local and state elections for the better. Public financing further motivates candidates to spend more time interacting with all communities. This leads to more people being engaged and increases public participation. It lets more people consider running for office who might not have felt they could access the networks to raise enough funds. It allows candidates to campaign without needing to rely on those who can give the largest donations, which can then make them feel less beholden to certain donors. And crucially, it helps grow the public's trust in our elections and our governments. These are the reasons why the IAC enthusiastically recommended that the Board of County Commissioners take the bold action of adopting this policy package.

Our democracy is fundamental to who we are. A healthy democracy means people's voices are heard. It means that our neighbors can join in the conversation about how to make their County a better home. It means that residents from historically marginalized communities can remove barriers to having a seat at the table, or even build a new one. It means that truly the best ideas rise to the top and make a positive difference in all of our lives. It means we can build trust in our elections by supporting integrity and ethical leadership. And by tending to our democracy, it means that we truly value the many community members of Multnomah County.

–The Multnomah County Public Campaign Financing Implementation Advisory Committee

# Campaign Financing Program Implementation Plan

Implementing a dynamic public campaign financing program can be complicated and requires a precise process. Phase I involved the IAC being established, developing its recommendations, and then issuing them in a report. With the report being finalized, Phase I of the implementation project is concluded.

## Phase II: May-August 2025

The next phase engages the Board of County Commissioners in considering the recommendations, adopting the program's budget, crafting the policy itself and its legal language, and then establishing the policy with a Board vote. Phase II is sequenced below.

The IAC emphasized that significant community engagement must follow the release of its report. The recommendations were crafted by 10 individuals from many different communities, with a wide range of backgrounds and expertises. However, this report should still be provided early to advocates and community organizations to gain their feedback. They are grounded in the ever-shifting campaign landscape and what would work best for the populations that they represent. Asking their direct input would help make the recommendations even stronger. It would also help to build the credibility of—and trust in—the program. We propose that County staff conduct these listening sessions, and compile the feedback for the Board members.

### Board of County Commissioners

1. BOCC receives IAC report and public presentation on the policy recommendations
2. County staff engage with and collect feedback on the IAC proposal from community organizations, experts, and the public
3. BOCC reviews budget proposal from the Chair, adopts a funding amount
4. BOCC considers a resolution communicating support for the program and allowing the staff to proceed into implementation
5. County staff compiles community feedback and provides it to the BOCC
6. BOCC considers IAC policy recommendations
7. BOCC formally establishes the public campaign financing program and the policies that the program will implement

## Phase III: June-December 2025

The Board of County Commissioners adopting a budget and policy would be the significant milestone to allow the program to move forward in implementation. Yet there are many more steps required after the Board takes action before the program can launch by its target date: December 1st, 2025.

Below is the sequencing plan for Phase III. This would involve establishing the Oversight Commission, developing the program's numerous administrative rules and procedures, educating organizations that engage in electoral advocacy and potential candidates, developing the reporting software technology, and hiring the personnel. For some items in particular that will take longer to develop, the best approach would be to initiate those early in the Summer 2025, before the BOCC adopts the rest of the policy. If tasks such as seating the Oversight Commission, hiring the program specialist, and securing the software vendor contract can be prioritized and expedited, it would help to ensure that the program could be fully launched in the desired project timeline.

## Oversight Commission

1. Open applications to the public
2. Compile list of applicants for the Board to review and nominate from
3. Board nominates and votes on oversight commission members
4. Oversight Commission receives initial briefings and ethics training
5. Oversight Commission establishes processes, meeting schedule, elects Chair
6. Oversight Commission reviews list of applicants and nominates remaining four members for appointment by the Board
7. Oversight Commission reviews administrative rule proposals and votes on these policies:
  - a. Program timeline for participation
  - b. Penalty matrix
  - c. Process for resolution of rule violations
  - d. Complaints, investigations, issuing findings, appeals
  - e. Reporting requirements
  - f. Definitions for allowable contributions and expenditures
  - g. Direct donations, in-kind donations, use of matching funds
  - h. Candidates switching races, repaying debt, fair market value rubric, training requirements, participant application process
  - i. Any other provisions covered under the Commission's enumerated powers

## External Communication

1. Compilation of program's laws and administrative rules to a digestible format
2. Education of organizations, consultants, candidate training academies, potential candidates, and media
3. Development of formal training materials and program forms
4. Candidates begin to apply to participate

## Operations

1. Reporting software vendor identified, contract signed
2. Reporting software developed
3. Job listing published for program specialist
4. Interviews conducted, candidates identified, program specialist hired
5. Reporting software beta-tested, completed, and launched
6. Job listing published for on-call employees
7. Interviews conducted, candidates identified, positions hired

**Public Campaign Financing Program Officially Launched: December 1, 2025**

# About the Public Campaign Financing Implementation Advisory Committee



**Becca Uherbelau** has more than 25 years of experience leading strategy and operations in civic engagement, electoral politics and movement building spaces. She has worked in public service for local and state government, led electoral and community-based non-profits, and directed statewide ballot measures, local issues, and candidate campaigns. She is currently the Executive Director of the Oregon Donor Alliance. Becca has also served as Director of Equity and Racial Justice for Oregon's Governor and led Our Oregon, a social and economic justice coalition with a focus on elections and ballot measures.



**Beth Chvilicek** brings extensive experience in grassroots organizing, advocacy, and campaign work at both local and statewide levels. Through this work, Beth strives to empower communities and enact tangible change by promoting equity and centering the voices of those most impacted by systemic inequities. Serving on this committee underscores their commitment to advancing a more inclusive and representative democracy.



**Felisa Hagins** is the Executive Director of the Service Employees International Union Oregon State Council. SEIU is the largest union in America with over 2.1 million members and SEIU in Oregon we represent over 85,000 workers. Felisa has been working at SEIU for 20 years. As the political director she has had the opportunity to work on the lobby and policy side as well as the electoral side of political work. She has worked on presidential campaigns, state legislative campaigns and local governments in Oregon, Iowa, California, Nevada and Washington. Felisa spends most of her lobbying and policy hours focused on health care reform, commercial real estate, and worker's rights; a variety that never lets her get bored.



**James Ofsink** has dedicated the last 15 years to strengthening Oregon’s democracy and is honored to help design Multnomah County’s new public financing program. He has served in leadership roles with democracy-focused organizations, including the League of Women Voters (Portland and Oregon chapters), the City Club of Portland, and currently as President of Portland Forward. James has contributed to designing campaign contribution limits at the city, county, and state levels and has worked extensively within Portland’s public financing system.



**Kari Chisholm** is a Portland-based political strategist, who has worked on over 300 campaigns in 30 states over two decades. In 2023, he served on the independent commission that drew the maps for Portland’s new district-based city council.



**Kezia Wanner** is a strategic executive leader with extensive expertise in municipal management. She began her public service career as an Analyst with the City of Woodburn’s Administrator’s Office and continued building her career in finance, budget, and operational management while working at the City of Portland and Multnomah County. In a desire to serve the community in a different capacity, she ran for Portland City Council District 3 seat in 2024. Currently, she has the honor of serving as Portland City Councilor Dan Ryan’s Chief of Staff.

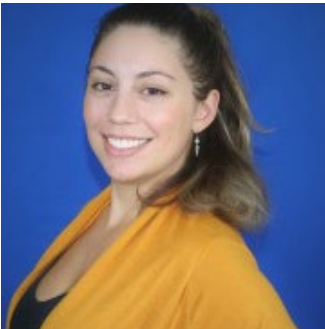


**Luong Nguyen** is a dedicated civic leader and high achieving student at Gresham High School. With extensive experience in public policy, civic engagement, and community advocacy, Luong is dedicated to serving his community and local non profits like Gresham Barlow School District, the Oregon School-Based Health Alliance, NextUp! and more! Passionate about empowering youth voices and advancing equity, Luong brings a thoughtful and solutions oriented perspective to all of his endeavors.





**Marshall McGrady** has been a member of IBEW Local 48 for the last 25 years and is a licensed Signing Supervising electrician in the state of Oregon. He currently works as the Government Affairs Director for Local 48 where he works with elected officials throughout the state and is heavily involved in renewable energy projects and policy. He is interested in serving on the campaign finance committee in order to ensure a common sense approach to campaign finance limits that allows all Oregonians the opportunity to participate in the political process.



**Roxanna Pinotti** is an administrative professional with Portland Public Schools and a recent Portland transplant who is excited to serve her new community through public service. She brings over 13+ years of diverse work experience as an IT professional, a paralegal at an immigration law firm, and a finance manager for a small, family-owned company. Roxanna looks forward to fostering financial transparency and equity within electoral processes for the benefit of Multnomah County residents.



**Terrence Hayes** was a Portland City Council candidate in the 2024 election and participated in the Public Campaign Finance matching funds program with his campaign. Terrence has served on several community advisory committees including the Multnomah County District Attorney's Justice Integrity Unit, the Local Public Safety Coordinating Council, City of Portland Police's Focused Intervention Team Community Oversight Group and the Governor's 90-Day Fentanyl Emergency Portland Central City Task Force. Terrence is a husband, father, small business owner hiring formerly incarcerated black men, and community leader in the restorative justice and public safety spaces.

**Staff support provided to the Implementation Advisory Committee by:**

**Daniel Lewkow**

Program Manager, Public Campaign Finance, Multnomah County

**Hayden Miller**

Senior Strategic Initiatives Manager, Multnomah County

**Samuel Ashby**

Director of Strategic Initiatives, Multnomah County

**With gratitude to the following County staff for their support and expertise:**

**Katherine Thomas**

Senior Assistant County Attorney, Multnomah County

**Jenny Madkour**

County Attorney, Multnomah County

**Jeff Renfro**

County Economist, Multnomah County

**Christian Elkin**

Budget Director, Multnomah County

**Janette Quan-Torres**

Graphic Designer, Multnomah County

**Julie Sullivan-Springhetti**

Communications Director, Multnomah County

# Appendix

## Appendix: Match Grant Caps

### County Voter Registration Historic Data

To build a cost-per-voter analysis, the Committee needed to understand how many registered voters are anticipated to live in the County and each of the Commission districts in upcoming election cycles. This represents the total pool of potential voters, and how to build an estimation on the number of voters who will cast ballots in future elections.

The IAC had access to publicly-available data and pulled the below numbers from the election turnout statistics. We could then better understand the previous growth trends.

<b>Year &amp; Position</b>	<b>Voter Registration</b>	<b>Year &amp; Position</b>	<b>Voter Registration</b>	<b>Year &amp; Position</b>	<b>Voter Registration</b>
May 2020 <sup>58</sup>		May 2022 <sup>59</sup>		May 2024 <sup>60</sup>	
Countywide	538,330	Countywide	557,760	Countywide	554,468
District 1	148,607	District 2	145,959	District 1	143,082
District 3	129,207	–	–	District 2	144,367
District 4	119,136	–	–	District 3	138,247
–	–	–	–	District 4	128,772

### Anticipated County Voter Registration

Using historical data, we could apply the same trends to future years. This gave the IAC an estimate of how many registered voters there will be in the County and each district. The IAC notes that these trends cannot factor in changes due to economic or environmental conditions. This represents an estimate, and the IAC requests that the County utilize internal analysis to confirm the trends.

<b>Year</b>	<b>Expected Registration</b>		
2022 County	557,760		
2024 County	554,468		
2026 County	551,176		
<b>District</b>	<b>Voter Reg.</b>	<b>District</b>	<b>Voter Reg.</b>
2020 D1	148,607	2020 D3	129,207
2024 D1	143,082	2024 D3	138,247
2028 D1	137,557	2028 D3	147,287
2022 D2	145,959	2020 D4	119,136
2024 D2	144,367	2024 D4	128,772
2026 D2	142,775	2028 D4	138,408

58 [https://multco.us/file/bp-047a\\_2020-05.pdf/download](https://multco.us/file/bp-047a_2020-05.pdf/download)

59 [https://multco.us/file/bp-047a\\_2022-05.pdf/download](https://multco.us/file/bp-047a_2022-05.pdf/download)

60 [https://multco.us/file/bp\\_047a\\_2024-05/download](https://multco.us/file/bp_047a_2024-05/download)



Historic Voter Turnout

The IAC then reviewed historical voter turnout. It used recent turnout in the most competitive November district races to understand changing voter perceptions and engagement, since beginning in 2026 the County will only hold regularly-scheduled elections in November. The percentage turnout was then applied to the voter registration trends, to develop an estimate for how many voters will cast a ballot.

The County has not had a competitive November election for District 3 or Sheriff in over a decade. Because modern data does not exist, we did not include it in the below table. The last competitive November election for District 4 was 2016.

District	Month	Year	Eligible Votes	% Turnout	Total Votes
1 <sup>61</sup>	November	2024	150,107	61%	91,580
2 <sup>62</sup>	November	2024	149,046	65%	96,811
4 <sup>63</sup>	November	2016	106,274	50%	53,678
Auditor <sup>64</sup>	November	2018	530,395	53%	281,85
Chair <sup>65</sup>	November	2022	566,617	54%	305,211

Because the policy recommendation was to have the same match grant cap for candidates running in each district, we took the averages from the historic voter turnout and applied that to future races.

Adjusted			
2026 Chair	54%	2028 D1	61%
2026 D2	54%	2028 D3	61%
2026 Auditor	53%	2028 D4	61%
2026 Sheriff	53%	–	–

61 [https://multco.us/file/2024-11\\_report\\_12.pdf/download](https://multco.us/file/2024-11_report_12.pdf/download)  
62 [https://multco.us/file/2024-11\\_report\\_12.pdf/download](https://multco.us/file/2024-11_report_12.pdf/download)  
63 <https://results.oregonvotes.gov/ResultsSW.aspx?type=CTYALL&cty=26&map=CTY&eid=82>  
64 <https://results.oregonvotes.gov/ResultsSW.aspx?type=CTYALL&cty=26&map=CTY&eid=12>  
65 <https://results.oregonvotes.gov/ResultsSW.aspx?type=CTYALL&cty=26&map=CTY&eid=98>

## Anticipated Voter Turnout

We could then combine all the data to estimate turnout in future County elections. Below is the anticipated voter registration multiplied by the percentage of turnout, to then establish the number of voters that are anticipated to cast a ballot in upcoming elections.

<b>Election</b>	<b>Anticipated Voter Registration</b>	<b>Turnout</b>	<b>Anticipated Turnout</b>
2026 Chair	551,176	54.00%	297,635
2026 D2	142,775	54.00%	77,099
2026 Auditor	551,176	53.00%	292,123
2026 Sheriff	551,176	53.00%	292,123
2028 D1	137,557	61.00%	83,909
2028 D3	147,287	61.00%	89,845
2028 D4	138,408	61.00%	84,429

## Historic Cost per Voter, adjusted to inflation

Next, the IAC needed to establish what the cost-per-voter was before contribution limits were enforced in 2022. The focus is on this period because that was a time when candidates could raise enough funds to run robust campaigns. Competitive races for District 3 and Sheriff did not occur during this period, to address those situations, staff analyzed cost-per-voter data from elections taking place prior to the enforcement of contribution limits. This helps us understand the financial need that campaigns have.

The analysis below is based on publicly-available data, showing the amount that the campaigns spent for the election cycle,<sup>66</sup> divided by the number of votes cast in their election.<sup>67</sup> Those numbers were averaged over multiple campaigns and then adjusted to inflation to arrive at what they would be under the current economic conditions.

<b>Contested Race</b>	<b>CpV</b>
Chair	5.29
District 1	4.46
District 2	2.15
District 3	2.97
District 4	4.04
Auditor	0.11
Sheriff	0.49

66 <https://secure.sos.state.or.us/orestar/cfFilings.do>

67 <https://multco.us/info/results-and-history-multnomah-county-elections>

## Anticipated Cost per Voter

The historic cost per voter amount was then multiplied by the anticipated turnout to arrive at the numbers below. The Chair's race was adjusted to follow a simulation, because the only pre-limits data that was available was from an election held under circumstances that dramatically skewed the results. This represents how much a candidate would need to run a robust campaign in 2025.

Chair	\$827,425
D1	\$412,503
D2	\$164,991
D3	\$266,840
D4	\$341,093
Auditor	\$32,134
Sheriff	\$143,140

## Match Grant Caps

The IAC now had all the data required to establish the match grant caps. We identified the total financial need established by the cost-per-voter methodology. Then we took the average fundraising for these campaigns and subtracted that from the total financial need. This clarified the amount of public matching funds the campaigns would require to run a robust campaign under present circumstances. Those numbers were then rounded to reflect numbers that were easier to convey to candidates and the public. That provided the IAC with the ideal match grant caps. Finally, those numbers were adjusted for inflation.<sup>68</sup> The IAC decided to increase the estimate of the Auditor's financial need to \$50,000, to allow for the candidates to effectively communicate with residents.

The most important metric here is how closely the "Campaign Budget" column keeps pace with the "Total Need" column. Additionally, the matching amount figures for County Commission races needs to be identical, for simple communication to the public and because the districts are designed to have approximately equal numbers of residents. The campaign budget may appear larger than the total need for one of the district offices, but this method allows for a consistent approach and for campaigns to adjust accordingly if the race is more competitive or independent expenditures occur.

## **2025 Analysis**

Office	Total Need	Avg Fundraising	Matching Funds	Rounded	Campaign Budget
Chair	\$827,425	\$217,689	\$609,736	\$650,000	\$867,689
D1	\$412,503	\$110,597	\$301,906	\$250,000	\$360,597
D2	\$164,991	\$110,597	\$54,394	\$250,000	\$360,597
D3	\$266,840	\$110,597	\$156,243	\$250,000	\$360,597
D4	\$341,093	\$110,597	\$230,496	\$250,000	\$360,597
Auditor	\$32,134	\$24,369	\$7,765	\$50,000	\$74,369
Sheriff	\$143,140	\$81,193	\$61,947	\$100,000	\$181,193

68 <https://www.calculator.net/inflation-calculator.html?cstartingamount2=143%2C140&cinrate2=3&cinyear2=5&calctype=2&x=Calculate#forward>

**With 2026 Inflation**

Office	Total Need	Avg Fundraising	Matching Funds	Rounded	Campaign Budget
Chair	\$852,247	\$224,219	\$628,028	\$650,000	\$874,219
D2	\$169,940	\$113,914	\$56,026	\$250,000	\$363,914
Auditor	\$33,098	\$25,100	\$7,998	\$50,000	\$75,100
Sheriff	\$147,434	\$83,628	\$63,806	\$100,000	\$183,628

**With 2028 Inflation**

Office	Total Need	Avg Fundraising	Matching Funds	Rounded	Campaign Budget
D1	\$450,753	\$120,852	\$329,901	\$250,000	\$370,852
D3	\$291,583	\$120,852	\$170,731	\$250,000	\$370,852
D4	\$372,721	\$120,852	\$251,869	\$250,000	\$370,852

**With 2030 Inflation**

Office	Total Need	Avg Fundraising	Matching Funds	Rounded	Campaign Budget
Chair	\$959,212	\$252,361	\$706,851	\$650,000	\$902,361
D2	\$191,269	\$128,212	\$63,057	\$250,000	\$378,212
Auditor	\$37,352	\$28,250	\$9,102	\$50,000	\$78,250
Sheriff	\$164,938	\$94,124	\$70,814	\$100,000	\$194,124

# Appendix: Qualification Thresholds

## Qualification Thresholds in other Jurisdictions

To determine an appropriate qualification threshold, the IAC evaluated the thresholds in other jurisdictions with similar programs. The table below includes that information, and aside for jurisdictions that have similar sizes of population to Multnomah County. The table shows the number of qualifying donors that candidates need to receive matching funds, depending on the office sought. Generally, the number required is between 500-1000 for the chief executive positions, between 250-500 for other positions that are elected countywide or citywide, and between 75-250 a district-based position (it is important to note that the districts vary widely in population sizes). San Francisco has different requirements for candidates depending on whether they are incumbents, Albuquerque requires a percentage of registered voters in each district.

Name	Mayor/Chair	District Councilors	Locality-Wide
Albuquerque <sup>69</sup>	3780	335-466	N/A
Baltimore <sup>70</sup>	500	150	250
Anne Arundel Co <sup>71</sup>	500	75	N/A
Portland <sup>72</sup>	750	250	250
Washington DC <sup>73</sup>	1000	150	500
Denver <sup>74</sup>	250	100	100
Seattle <sup>75</sup>	600	150	400
San Francisco <sup>76</sup>	500/750	100/150	N/A
Baltimore Co <sup>77</sup>	550	150	N/A

69 <https://www.cabq.gov/vote/candidate-information/publicly-financed-candidates>

70 <https://fairelectionfund.baltimorecity.gov/>

71 [https://codelibrary.amlegal.com/codes/annearundel/latest/annearundelco\\_md/0-0-0-127088#JD\\_1-12-110](https://codelibrary.amlegal.com/codes/annearundel/latest/annearundelco_md/0-0-0-127088#JD_1-12-110)

72 <https://www.portland.gov/smalldonorelections/how-run-under-sde>

73 [https://ocf.dc.gov/sites/default/files/dc/sites/ocf/page\\_content/attachments/Public%20Finance%20%20Program\\_Training.pub%20Revised%20May%202023.pdf](https://ocf.dc.gov/sites/default/files/dc/sites/ocf/page_content/attachments/Public%20Finance%20%20Program_Training.pub%20Revised%20May%202023.pdf)

74 Pg 32 <https://www.denvergov.org/files/assets/public/v/3/clerk-and-recorder/documents/campaignfinancemanualversion1.1.pdf>

75 <https://www.seattle.gov/democracypoucher/i-am-a-candidate>

76 <https://sfethics.org/guidance/campaigns/candidates/public-financing-program/steps-to-qualify-to-receive-public-funds/prepare-a-public-financing-application>

77 <https://www.baltimorecountymd.gov/boards-commissions/fair-election-fund>

## Number of Donors to County Campaigns

The IAC's recommendation was informed by recent data. It used anonymized contribution reports from 19 County campaigns held between 2020 and 2024. Two campaigns were included from before contribution limits were enforced in 2022, to provide a broader sample of certain offices. Successful campaigns that raised significant funds were included to reflect the types of campaigns the program should expect to provide matching funds to. Both the number of total unique donors and the number of total unique donors who lived in the County were calculated, because there is a residency requirement for qualifying donors. The IAC could then build a recommendation for realistic threshold numbers. Many of the candidates listed below had enough donors to qualify for the initial tiers, or could qualify by shifting fundraising strategies to focus on attracting more small dollar donors. The tier qualification thresholds are designed to be achievable for candidates, while also encouraging them to broaden their fundraising base.

<b>Chair-2022</b>						
<b>Candidates</b>	<b>Average</b>	<b>Candidate 1</b>	<b>Candidate 2</b>	<b>Candidate 3</b>	<b>Candidate 4</b>	<b>Candidate 5</b>
Total Unique Indiv Donors	370	597	727	180	191	154
Total Unique Indiv Donors-Mult	280	435	594	119	145	106

<b>District 1 Commissioner 2020-2024</b>				
<b>Candidates</b>	<b>Average</b>	<b>Candidate 1</b>	<b>Candidate 2</b>	<b>Candidate 3</b>
Total Unique Indiv Donors	281	193	240	412
Total Unique Indiv Donors-Mult	215	145	142	358

<b>District 2 Commissioner 2022-2024</b>					
<b>Candidates</b>	<b>Average</b>	<b>Candidate 1</b>	<b>Candidate 2</b>	<b>Candidate 3</b>	<b>Candidate 4</b>
Total Unique Indiv Donors	511	673	666	242	464
Total Unique Indiv Donors-Mult	390	524	487	213	339

<b>District 3 Commissioner 2023-2024</b>				
<b>Candidates</b>	<b>Average</b>	<b>Candidate 1</b>	<b>Candidate 2</b>	<b>Candidate 3</b>
Total Unique Indiv Donors	287	301	356	206
Total Unique Indiv Donors-Mult	205	216	251	150

<b>District 4 Commissioner 2020-2024</b>			
<b>Candidates</b>	<b>Average</b>	<b>Candidate 1</b>	<b>Candidate 2</b>
Total Unique Indiv Donors	174	241	108
Total Unique Indiv Donors-Mult	130	174	87

<b>Sheriff 2022</b>			
<b>Candidates</b>	<b>Average</b>	<b>Candidate 1</b>	<b>Candidate 2</b>
Total Unique Indiv Donors	260	256	263
Total Unique Indiv Donors-Mult	112	93	130



### Percent of total raised by district

The IAC considered including a requirement that Commissioner candidates have a certain number of donors from their districts to qualify for matching funds. For the reasons discussed earlier, we declined to recommend this approach. But we did examine the data behind this question. Below is the percentage of the total amount that County candidates raised from Multnomah County donors, broken down by district.

Generally, Commissioner candidates raise the majority or plurality of their funds from within their district. But it is striking that such a high proportion of nearly every candidate's fundraising comes from District 1. This showed that under the current system, candidates are incentivized to spend time campaigning with donors who may not be their constituents. A public financing program can help shift that focus to small dollar donors who live within their candidate's district, by ensuring that candidates can run a financially-viable campaign based solely or mostly off of in-district support.

<b>Candidates</b>	<b>Office</b>	<b>Year</b>	<b>% District 1</b>	<b>% District 2</b>	<b>% District 3</b>	<b>% District 4</b>
Candidate 1	Chair	2022	48.24%	37.29%	11.41%	3.06%
Candidate 2	Chair	2022	77.75%	17.58%	4.21%	0.46%
Candidate 3	Chair	2022	53.51%	32.02%	9.57%	4.89%
Candidate 4	Chair	2022	74.80%	6.00%	1.71%	17.49%
Candidate 5	Chair	2022	28.92%	40.45%	25.56%	5.07%
Candidate 6	Comm 1	2020	67.57%	15.91%	13.20%	3.31%
Candidate 7	Comm 1	2024	73.89%	16.53%	6.56%	3.02%
Candidate 8	Comm 1	2024	87.66%	11.24%	0.86%	0.23%
Candidate 9	Comm 2	2022	41.77%	50.71%	5.78%	1.74%
Candidate 10	Comm 2	2024	47.10%	49.16%	3.53%	0.21%
Candidate 11	Comm 2	2024	24.10%	58.45%	14.97%	2.48%
Candidate 12	Comm 3	2023	30.33%	29.31%	26.33%	14.04%
Candidate 13	Comm 3	2023	35.40%	9.18%	54.97%	0.45%
Candidate 14	Comm 3	2024	35.55%	16.16%	48.21%	0.08%
Candidate 15	Comm 4	2020	34.80%	24.54%	17.29%	23.36%
Candidate 16	Comm 4	2024	14.62%	5.60%	0.20%	79.58%
Candidate 17	Sheriff	2022	76.46%	15.66%	3.42%	4.46%
Candidate 18	Sheriff	2022	38.49%	35.77%	5.10%	20.64%

# Appendix: Budget

## Number of County Candidates in Previous Cycles

Below is a table of the number of candidates who have historically run for each position, based on the County's tracking of candidates who filed in these races.<sup>78</sup> The average is rounded to the nearest integer. The IAC noted that these were smaller candidate pools than Portland's elections.

	2024	2023 Special	2022	2020	2018	2016	Average
<b>Chair</b>	–	–	6	–	4	–	5
<b>District #1</b>	5	–	–	2	–	7	5
<b>District #2</b>	5	–	3	–	4	–	4
<b>District #3</b>	2	3	–	1	–	1	2
<b>District #4</b>	3	–	–	1	–	3	2
<b>Auditor</b>	–	–	1	–	3	–	2
<b>Sheriff</b>	–	–	3	–	1	–	2

## Candidate Pool Estimates for Future Elections

To be able to predict the number of candidates who will run in future County races, the IAC analyzed the average increases when jurisdictions adopted matching programs and ranked-choice-voting methods. Seattle implemented a matching program in 2017, and adopted a ranked-choice-voting method (although the latter has not been implemented yet). New York City has had a matching program since 1988, and it implemented ranked-choice-voting in 2021. Both policies resulted in an increase in the size of the candidate pools. The IAC included the Portland Mayoral elections, but excluded the Portland City Council races that occurred under public campaign financing. The 2020 and 2022 City Council candidates did not run in districts, and the 2024 elections saw a tripling of the available seats with very few incumbents, so these races would not be apt comparisons. The IAC then averaged the percentage increases and applied them to the historic average of candidates who ran for County offices. The IAC estimated that the Auditor and Sheriff elections will not see such marked increases, because their candidate pools are smaller due to requirements for professional certifications and their historic averages.

78 <https://multco.us/info/results-and-history-multnomah-county-elections>

Average Candidate Increase from Public Campaign Financing & Ranked Choice Voting	
Portland Mayor Increase <sup>79</sup>	+5%
Seattle Mayor Increase <sup>80</sup>	+133%
NYC Mayor Increase <sup>81</sup>	+33%
Seattle Council Increase	+133%
NYC Council Increase	+49%

Anticipated Candidate Increase in MultCo Races			
	Current	RCV+PCF	Expected
<b>Chair</b>	5	59%	8
<b>District 1</b>	5	94%	10
<b>District 2</b>	4	94%	8
<b>District 3</b>	2	94%	4
<b>District 4</b>	2	94%	4
<b>Auditor</b>	2	N/A	2
<b>Sheriff</b>	2	N/A	2

#### Anticipated Number of County Candidates in Future Elections

The IAC then applied the projections of the number of candidates to each election cycle. Because the County does not hold all elections each cycle, the IAC needed to understand which candidates run in which cycles to craft a budget estimation.

	2026	2028	2030	2032
<b>Chair</b>	8	–	8	–
<b>District #1</b>	–	10	–	10
<b>District #2</b>	8	–	8	–
<b>District #3</b>	–	4	–	4
<b>District #4</b>	–	4	–	4
<b>Auditor</b>	2	–	2	–
<b>Sheriff</b>	2	–	2	–
<b>Total Chair</b>	8	–	8	–
<b>Total Comm.</b>	8	18	8	18
<b>Total Auditor</b>	2	–	2	–
<b>Total Sheriff</b>	2	–	2	–

79 <https://www.portland.gov/auditor/elections/city-office-candidacy/2024-city-candidates>

80 <https://web6.seattle.gov/ethics/elections/campaigns.aspx?cycle=2013&type=home&IDNum=0&leftmenu=collapsed>

81 <https://www.nycclf.info/follow-the-money/candidates/2017>

## Anticipated Number of Candidates Qualifying for Matching Funds

Matching programs are optional and challenging to qualify for by design. Therefore, not every candidate who runs will opt into the program or qualify for matching funds. Based on Portland's history with its matching program, the table below shows the percentage of the total candidate pool who qualified for matching funds, which is averaged over 3 election cycles.<sup>82</sup> That percentage is then applied to the anticipated number of County candidates. The IAC could then develop an estimation of how many County candidates will likely qualify for matching funds, which is key for developing a budget projection.

	<b>Total Anticipated</b>	<b>Qualifying</b>	<b>Total Qualifying</b>
<b>Total Chair</b>	8	24%	2
<b>Total Commissioner</b>	26	35%	9
<b>Total Auditor</b>	2	100%	2
<b>Total Sheriff</b>	2	100%	2

## Total Amount of Matching Funds Required per Election Cycle

The IAC combined the estimates of qualifying candidates with its match grant cap recommendation. The risk for these programs is when more matching funds are required than what the program has budgeted for due to more candidates qualifying. To mitigate that risk, the IAC added space for 2 additional candidates to qualify in the Chair elections, and 1 additional in the other elections. This established our projection for the amount of matching funds required each cycle.

	<b>2026</b>	<b>2028</b>	<b>2030</b>	<b>2032</b>	<b>Rounded</b>
<b>Chair Candidates</b>	4	–	4	–	\$650,000
<b>District #1 Candidates</b>	–	5	–	5	\$250,000
<b>District #2 Candidates</b>	4	–	4	–	\$250,000
<b>District #3 Candidates</b>	–	3	–	3	\$250,000
<b>District #4 Candidates</b>	–	3	–	3	\$250,000
<b>Auditor Candidates</b>	3	–	3	–	\$50,000
<b>Sheriff Candidates</b>	3	–	3	–	\$100,000
<b>Chair Matching</b>	\$2,600,000	–	\$2,600,000	–	–
<b>District #1 Matching</b>	–	\$1,250,000	–	\$1,250,000	–
<b>District #2 Matching</b>	\$1,000,000	–	\$1,000,000	–	–
<b>District #3 Matching</b>	–	\$750,000	–	\$750,000	–
<b>District #4 Matching</b>	–	\$750,000	–	\$750,000	–
<b>Auditor Matching</b>	\$150,000	–	\$150,000	–	–
<b>Sheriff Matching</b>	\$300,000	–	\$300,000	–	–
<b>Total</b>	\$4,050,000	\$2,750,000	\$4,050,000	\$2,750,000	–

82 <https://openelectionsportland.org/?startDate=Sun+Jan+01+2023+00%3A00%3A00+GMT-0800+%28Pacific+Standard+Time%29&financing=all&offices=+Councilor+District+4&offices=+Councilor+District+1&offices=+Councilor+District+3&offices=+Councilor+District+2>

## Program Budget

After developing the total amount of matching funds required, the IAC could evaluate the impacts of a funding formula. It reviewed the number of residents according to the most recent data from the Census Bureau. That data showed a 0.02% population increase between 2023 and 2024. That percentage increase was then applied to the next 5 years to gain a population projection. If the program were initially funded with a \$5 million startup allocation and then a \$5-per-resident (adjusted for inflation) formula afterwards, it would generate the amount listed in the Funding column.

The program costs were then factored in. While the matching funds are expended in even years, the program must have the full amount earmarked before candidates begin to run for office, to confidently communicate the matching amounts to campaigns and allow them to make an informed decision about whether to opt into the program. The Other Costs include personnel and facilities expenses, with \$500,000 for software development in the first year.

The Rollover column includes the unexpended funds from the previous year, combined with the annual allocation, minus the expenses. It is projected out through 2029, because the recommendation is that the program can rollover funds for 4 years after the funding formula is implemented. The program is left with a growing surplus. However, the IAC noted that the surplus allows for the program to cover the costs of an unexpected special election, more candidates qualifying than anticipated, and additional personnel, contracting, and other expenses as needed. The IAC believed that it is a wiser approach to allow for a surplus, to avoid the potential for either reducing the matching amounts midway through a cycle, or program staff having to request sudden additional funds from the Board.

The IAC requested that the County Budget Office build its own funding and expenses projections, based on the formula and other points from its recommendation. The County Budget Office would be equipped to include its analysis of inflation, any automatic increases to personnel costs, and could ideally combine that with the County's population estimates. This will give the Board a confirmed estimation to evaluate.

<b>Calendar Year</b>	<b>Residents</b>	<b>Per Resident</b>	<b>Funding</b>	<b>Matching Earmarked</b>	<b>Other costs*</b>	<b>Rollover</b>
2025 - 26	795,897	Startup	\$5,000,000	\$4,050,000	\$949,105	\$895
2026 - 27	797,822	\$5.00	\$3,989,110	–	\$449,105	\$3,540,900
2027 - 28	799,417	\$5.30	\$4,236,910	\$2,750,000	\$449,105	\$4,578,705
2028 - 29	801,105	\$5.46	\$4,374,033	–	\$449,105	\$8,503,633
2029 - 30	802,707	\$5.63	\$4,519,240	\$4,050,000	\$449,105	\$8,523,768

\* "Other Costs" reflect personnel, IT, facility and other costs of administering the program, this estimate does not incorporate inflation estimates for those costs.

## Appendix: Contribution limits

### Simulation of Impact of a \$350 Contribution Limit

The IAC reviewed how a \$350 contribution limit would impact the campaigns for County offices. To do this, it counted the total number of donors who gave more than \$351, and the collective amount of their donations. Then we calculated how much those donors would have given in total if they each donated the \$350 maximum. When that number was subtracted from how much those donors actually gave, it produced the difference, which was taken as a percentage of the total the candidate raised. We then had clarity about the impact that a \$350 limit would have on the average of 18 candidates who ran between 2020-2024 (except for the Auditor races, in which we could not access the anonymized data).

	<b>Chair</b>	<b>Commissioner</b>	<b>Sheriff</b>
<b>Total Raised</b>	\$109,001	\$105,141	\$93,310
<b>Total Raised \$351+</b>	\$48,452	\$43,916	\$28,590
<b>Total Unique Indiv Donors \$351+</b>	87	60	49
<b>If \$351+ Donors gave \$350</b>	\$30,590	\$21,095	\$17,150
<b>Difference</b>	\$17,862	\$22,821	\$11,440
<b>Percentage Loss</b>	<b>-17.25%</b>	<b>-21.58%</b>	<b>-12.76%</b>