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December 2024

# CAMPAIGN FINANCE

## Observations on Public Financing Programs in Selected States and Localities

# GAO Highlights

Highlights of [GAO-25-106650](#), a report to congressional committees

## Why GAO Did This Study

While most electoral campaigns are privately financed, 14 states and 26 localities offer programs through which candidates running for state or local offices can use public funds to finance their campaigns, according to a 2024 Brennan Center for Justice report.

The House committee report accompanying the Financial Services and General Government Appropriations Bill, 2023, includes a provision for GAO to revisit and update its 2010 report ([GAO-10-390](#)) on public campaign financing programs. This report describes, among other things, (1) key characteristics of public campaign financing programs in selected states and localities; (2) what available data indicate about candidates' use of these programs; and (3) factors affecting candidate participation in these programs.

GAO selected five locations with state and local public campaign financing programs that covered executive and legislative offices, were implemented for at least two election cycles, and represented a mix of program models, among other factors. GAO reviewed relevant laws and documents and interviewed officials to describe key characteristics of the selected programs. GAO also analyzed candidate participation and campaign finance data for these five programs for the two most recent election cycles.

GAO interviewed officials from these five programs and four additional programs—selected using the same criteria—to obtain perspectives on public campaign financing programs. The findings from these interviews are not generalizable, but provide insight into state and local perspectives.

View [GAO-25-106650](#). For more information, contact Rebecca Gambler at (202) 512-8777 or [gambler@gao.gov](mailto:gambler@gao.gov).

December 2024

## CAMPAIGN FINANCE

### Observations on Public Financing Programs in Selected States and Localities

## What GAO Found

States and localities have generally implemented public campaign financing programs using one of three models: (1) grants—participating candidates receive lump-sum grants of public funds; (2) matching funds—participating candidates receive public funds matching certain private contributions they raise, at a set rate; and (3) vouchers—eligible residents receive a credit of public funds they can assign to one or more participating candidates. GAO selected five programs representing the three model types (Arizona; Los Angeles, California; Minnesota; Montgomery County, Maryland; and Seattle, Washington) and examined their characteristics. For example, all five programs have requirements for candidates to qualify for the program, and once qualified, to receive public funds. These requirements include, for example, collecting a specific number of contributions to qualify and then adhering to spending limits to receive public funds.

### Voting Booths



Source: [vesperstock/adobe.stock.com](#). | [GAO-25-106650](#)

The amount of public funding participating candidates received varied by office sought and location, among other things. For example, in Minnesota in the 2022 election, legislative candidates received an average of \$4,716 in public funds, and the one participating gubernatorial candidate received \$584,034 in public funds. In Los Angeles in the 2022 election, participating city council candidates received an average of \$198,151 in public funds, and participating mayoral candidates received an average of \$1,284,158 in public funds.

GAO interviewed officials from the five selected programs and four additional programs (Albuquerque, New Mexico; Hawaii; Maine; and Washington, D.C.) to obtain perspectives on candidate participation. Officials from all nine programs said that many candidates are attracted to the public campaign financing programs because they provide an accessible source of funding. This may be particularly appealing for candidates with limited fundraising experience. Officials from eight of the nine programs said a key reason candidates may not participate is because they perceive the available public funding to be insufficient to run a competitive campaign.

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December 19, 2024

The Honorable Chris Van Hollen  
Chair  
The Honorable Bill Hagerty  
Ranking Member  
Subcommittee on Financial Services and General Government  
Committee on Appropriations  
United States Senate

The Honorable David Joyce  
Chairman  
The Honorable Steny Hoyer  
Ranking Member  
Subcommittee on Financial Services and General Government  
Committee on Appropriations  
House of Representatives

Campaign finance is the raising and spending of money to influence electoral campaigns at the federal, state, and local levels. While most electoral campaigns are privately financed, 14 states and 26 localities have implemented programs that offer public financing to candidates running for certain state and local offices, such as governor, state representative, mayor, or county council, as of 2024.<sup>1</sup> At the federal level, public financing of political campaigns is available to presidential campaigns, but has not been widely used by major party candidates since the 2008 election.

Supporters of public financing of political campaigns see these programs as a way to increase competition, while reducing the influence of private money in the political process and enabling candidates to spend more time connecting with citizens rather than raising campaign funds. Opponents of these programs believe that they restrict free speech because they may limit the amount of money that candidates can spend on political advertisements, and they may force taxpayers to subsidize candidates whose views they may oppose.

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<sup>1</sup>Brennan Center for Justice, *Guide to Public Financing Programs Nationwide* (New York, N.Y.: 2024).

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The House committee report accompanying the Financial Services and General Government Appropriations Bill, 2023, included a provision for us to revisit and update our 2010 report on public campaign financing programs in two states, to account for data and experiences in selected states and localities that have established systems of public financing over the last five election cycles.<sup>2</sup> This report addresses (1) key characteristics of state and local public campaign financing programs in five selected locations; (2) what available data indicate about the use of these programs by candidates; and (3) factors affecting program structure and candidate participation in public campaign financing programs, and perspectives on the effects of these programs.

To address all three objectives, we selected public campaign financing programs in five locations—two states and three localities—to serve as nongeneralizable case studies. These locations are Arizona; Minnesota; the city of Los Angeles, California; Montgomery County, Maryland; and the city of Seattle, Washington. To select these locations, we identified programs that covered both executive and legislative offices, and had been implemented for at least two of the last five election cycles at the time of our analysis to ensure we could obtain similar information across selected programs. We also selected these locations to represent a mix of program models and populations, and considered information on candidate program participation according to publicly available sources, such as summary program statistics or annual reports found on a jurisdiction’s website. For further information on the public campaign financing programs in the five locations we selected for review, see appendix II.

To address our first objective, we reviewed program documentation and interviewed program officials to describe the key characteristics of the selected programs in the five case study locations. To address our second objective, we analyzed existing data from each of the five case study locations obtained from program officials or public sources. We analyzed available data on candidate participation in the public campaign

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<sup>2</sup>H.R. Rep. No. 117-393, at 67 (117th Cong.). The Explanatory Statement accompanying the Consolidated Appropriations Act, 2023, provided that the above committee report carries the same weight as language included in the joint explanatory statement. Staff of H. Comm. on Appropriations, 117th Cong., Explanatory Statement on the Consolidated Appropriations Act, 2023, Pub. L. No. 117-328, 136 Stat. 4459 (2022), at 1153 (Comm. Print 2023). GAO, *Campaign Finance Reform: Experiences of Two States That Offered Full Public Funding for Political Candidates*, [GAO-10-390](#) (Washington, D.C.: May 28, 2010).

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financing programs; election outcomes for primary and general elections for the last two election cycles in each location; and campaign finance data, such as public funding for candidates participating in the programs and reported contributions and expenditures for candidates in contests covered by public financing.

In each case study location, we analyzed data from the two most recent election cycles for which there were data available at the time of our analysis. Specifically, in Arizona, Minnesota, and Los Angeles, we analyzed data from elections in 2020 and 2022; in Montgomery County we analyzed data for the 2018 and 2022 elections; and in Seattle, we analyzed data for the 2019 and 2021 elections.<sup>3</sup> Additional information about these analyses and our assessment of data reliability can be found in appendix I.

To address our third objective on perspectives on the structure of public campaign financing programs, candidate participation, and program effects, we reviewed program documentation and interviewed officials from the five case study locations, as well as four additional locations with public campaign financing programs: Hawaii, Maine, Washington, D.C., and the city of Albuquerque, New Mexico, as shown in figure 1. We selected these additional locations by applying the same criteria we used to select the five case study locations, described above. We conducted interviews with officials from these four locations to obtain additional perspectives from program officials on public campaign financing programs.<sup>4</sup>

Additionally, we conducted a review of literature published since our last report on public campaign financing programs was issued in 2010. We reviewed 25 studies or reports on public campaign financing programs to obtain additional perspectives and research findings related to such programs. We also interviewed representatives from four nongovernmental organizations that we identified through our literature

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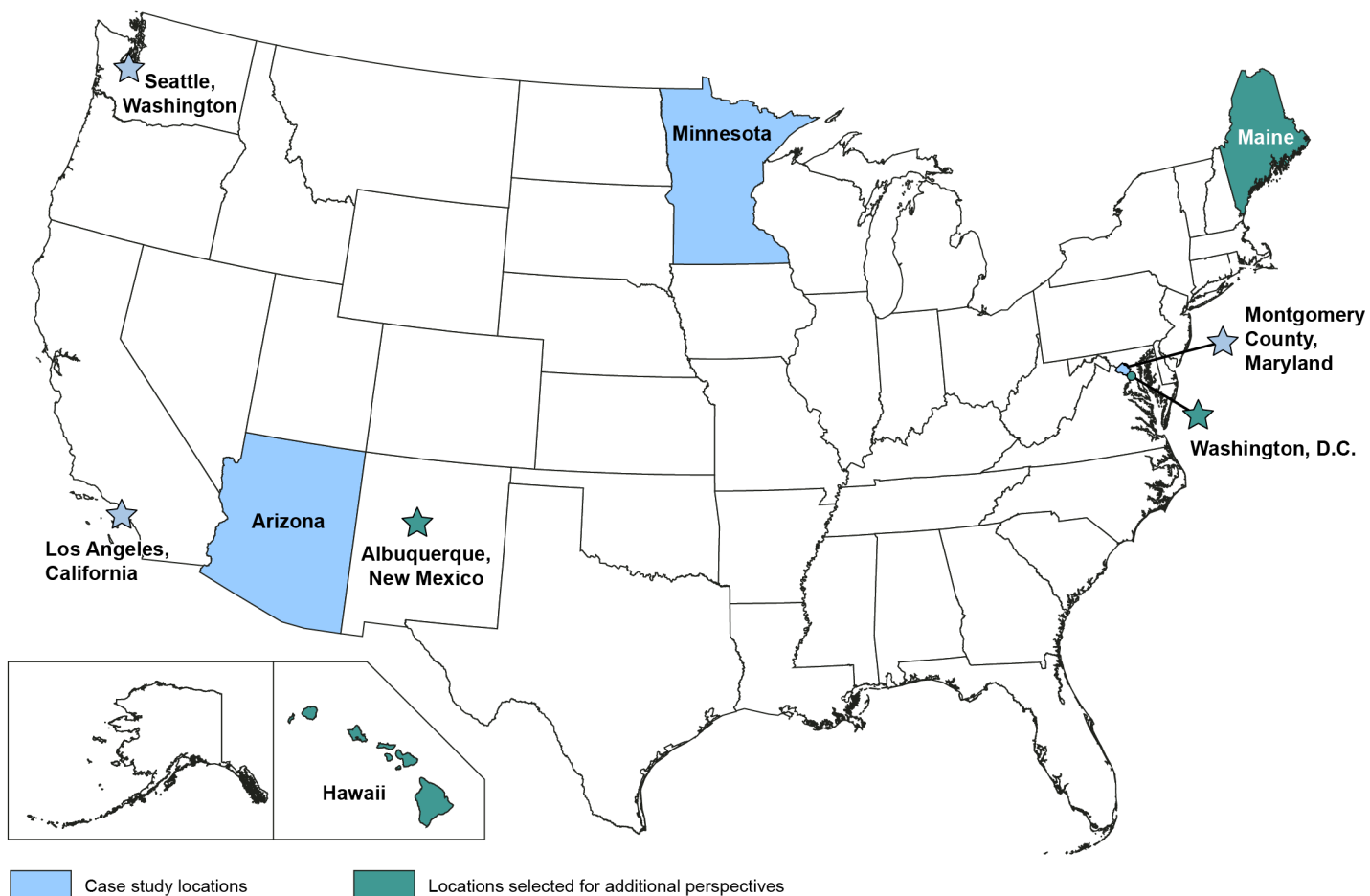
<sup>3</sup>In Minnesota, the public campaign financing program is only available to candidates participating in the general election, therefore data for Minnesota's primary election are not included in our analyses.

<sup>4</sup>In Seattle, we also spoke to representatives from two organizations that were contracted by the city to perform outreach to residents regarding the public campaign finance program.



review and our prior work related to this topic.<sup>5</sup> For additional information about our scope and methodology, see appendix I.

**Figure 1: States and Localities with Public Campaign Financing Programs Selected for Case Study and Additional Perspectives**



Source: GAO; U.S. Census Bureau. | GAO-25-106650

We conducted this performance audit from February 2023 to December 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to

<sup>5</sup>These organizations are the Brennan Center for Justice, the Campaign Legal Center, Common Cause – California, and the National Conference of State Legislatures.

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obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

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### Types of Campaign Finance Activities

Campaign finance refers to the raising and spending of money to influence electoral campaigns. Money raised for an electoral campaign is also referred to as a campaign “donation” or “contribution,” and money spent on a campaign is referred to as a campaign “expenditure.” Most expenditures on elections are privately financed, via contributions from individuals, political committees, and other organizations such as corporations, unions, and tax-exempt organizations.<sup>6</sup> In addition to these private sources of funding, federal public campaign financing is available for qualifying candidates for President of the United States during both the primaries and the general election, and in states and localities that have implemented their own public campaign financing programs.

### Public Campaign Financing Program Models

States and localities that have implemented public campaign financing programs have generally used three different models, according to our review of relevant literature and interviews with representatives from organizations familiar with these programs:

- **Grants.** The jurisdiction provides qualifying candidates with lump-sum grants of public funds to finance their campaigns. The grant amount can be either for the full or partial cost of a campaign, depending on the program. In full grant systems, also called “clean elections” programs, participating candidates may only make campaign expenditures with public funds and may not raise private contributions after receipt of the grant.
- **Matching Funds.** The jurisdiction matches certain private contributions received by participating candidates with public funds at a set rate. Depending on the jurisdiction, private contributions are matched either dollar for dollar or at some multiple of public-to-private dollars. Generally,

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<sup>6</sup>Federal campaigns may not accept contributions from the general treasuries of corporations, labor organizations or national banks. See 52 U.S.C. § 30118; 11 C.F.R. § 114.2. This prohibition applies to any incorporated organization, including a nonstock corporation, a trade association, an incorporated membership organization and an incorporated cooperative. A federal campaign may, however, accept contributions from political action committees established by corporations, labor organizations, incorporated membership organizations, trade associations, and national banks.

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these programs limit the size of contributions that are eligible for public matching (e.g., \$250 or less) and will not match contributions from certain sources (e.g., government contractors).

- **Vouchers.** The jurisdiction provides eligible residents with a credit of public funds (i.e., “vouchers”) to assign to one or more participating candidates of their choosing. For example, all eligible jurisdiction residents may receive four \$25 vouchers, worth \$100 in total, each election year. Residents may then assign their vouchers to more than one candidate or assign them all to the same candidate. Once residents have assigned vouchers to participating candidates, the candidates can redeem them with the jurisdiction for public funds to use in their campaigns.

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## Selected Public Campaign Financing Programs Have a Range of Characteristics Related to Their Goals, Funding, Requirements, and Oversight

Selected public campaign financing programs have a range of characteristics, which we identified as being associated with four key categories. These four categories are (1) program goals, (2) program funding and revenue sources, (3) candidate qualification and participation requirements, and (4) oversight mechanisms to ensure program integrity. We identified these categories based on our review of program information and interviews with officials and representatives of four nongovernmental organizations that have conducted research on state and local programs.

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### Program Goals

All five programs across the three model types have similar goals, according to program documents and interviews. For example, all five selected programs aim to decrease the reliance on special interest money or large donations, increase the number or diversity of candidates running for office, and increase trust in the government or the election process. Program officials and representatives from nongovernmental organizations also reported that different models tend to emphasize different aspects of these goals.

- **Goals of grant programs.** These programs generally focus on limiting the time and effort a candidate must spend on fundraising by reducing or eliminating the role of private financing for participating candidates (such as contributions from individuals, corporations, or political action committees), thus reducing the barrier to entry for more candidates wishing to run for office and helping position them for more community

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engagement.<sup>7</sup> For example, Minnesota officials stated that the public campaign financing grant program in their state is intended to provide individuals who are not familiar with fundraising a greater opportunity to run for office because it limits the amount of time a candidate may need to spend raising campaign funds. In addition, participating candidates in Arizona's public campaign financing program whom we interviewed as part of our 2010 report stated that one of the main reasons they chose to run their campaign with public funds in the 2008 election was to have more time to focus on interaction with voters.<sup>8</sup>

- **Goals of matching funds programs.** In contrast to grant programs, candidates in matching funds programs still rely on fundraising, but these programs generally focus on encouraging greater citizen engagement and interest by amplifying the value of small contributions from individuals (as opposed to corporations or political action committees). For example, in Los Angeles, the city charter section related to the public campaign financing program states that "monetary contributions to political campaigns are a legitimate form of participation in the American political process, but the finance strength of certain individuals or organizations should not permit them to exercise a disproportionate or controlling influence on the election of candidates."<sup>9</sup>

In addition, certain variations in the design of matching funds programs may further encourage candidates to obtain contributions from specific types of donors, such as those who reside within a candidate's jurisdiction district or those who are in a position to make relatively smaller contributions. For example, in Montgomery County, Maryland, a candidate may only receive matching funds if the donor is a resident of

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<sup>7</sup>According to the Federal Election Commission, political action committees are organizations that raise and spend money to elect and defeat candidates. There are different types of political action committees. Some are established and administered by corporations, labor unions, membership organizations, or trade associations. Some are directly or indirectly established or controlled by a candidate. Others are not connected to an individual candidate and finance independent expenditures and other independent political activity. An independent expenditure is an expenditure for a communication that expressly advocates the election or defeat of a clearly identified candidate; and is not made in cooperation, consultation, or concert with, or at the request or suggestion of any candidate, or his or her authorized committees or agents, or a political party committee or its agents. 11 C.F.R. § 100.16(a). According to the Federal Election Commission, an independent expenditure can be an advertisement through a website, digital device, application, advertising platform, newspaper, TV, or direct mail.

<sup>8</sup>[GAO-10-390](#).

<sup>9</sup>Public Matching Funds and Campaign Expenditure Limitations, L.A. Charter, § 471.

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the county.<sup>10</sup> In addition, county candidates receive a scaled matching ratio depending on the dollar amount of the contribution. For example, candidates receive \$6 in public funds for every \$1 in qualified contributions up to \$50, and increasingly smaller ratios of public to private funds as contributions increase, up to a \$0 to \$1 ratio for contributions over \$150.<sup>11</sup> According to a report from one nongovernmental organization, matched public funds provide a financial incentive for candidates to engage with individuals who can provide small contributions and let donors know that their contributions have a greater impact than they otherwise would.

- **Goals of voucher programs.** Similar to matching funds programs, voucher programs focus on citizen empowerment and engagement and prioritize doing so regardless of socioeconomic status. This is because vouchers provide the same dollar amounts to all residents regardless of their disposable income. According to program documents, Seattle's voucher program is specifically intended to increase the number of Seattle residents who donate in local elections with specific objectives to promote civic engagement in underserved communities.<sup>12</sup> A 2019 evaluation of Seattle's voucher program found that there was heavy utilization of vouchers by residents who had not previously donated to Seattle political campaigns.<sup>13</sup> According to a survey in this evaluation of residents who used vouchers in the 2019 election, respondents with incomes under \$50,000 reported that the voucher program allowed them to support campaigns in ways they could not previously.

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## Program Funding Sources

As shown in table 1, states and localities we studied use a variety of mechanisms to fund public campaign financing programs. These include standard appropriations from the state or local general fund; revenue from a specific tax, such as real estate taxes; or fines collected from candidates who violated program rules or regulations.

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<sup>10</sup>Montgomery Cty., Md. Code, § 16-18 (defining qualifying contribution as one made by a resident of the county, among other things).

<sup>11</sup>Id. at § 16-23.

<sup>12</sup>Seattle Ethics and Elections Commission, *Democracy Voucher Program 2021 Biennial Report* (Seattle, Washington, 2021).

<sup>13</sup>BERK, *2019 Election Cycle Evaluation: Seattle Ethics and Election Commission Democracy Voucher Program* (Seattle, Washington, 2020).

**Table 1: Program Funding Sources for Public Campaign Financing Programs in Selected Locations**

Funding/revenue sources	Grant programs		Matching funds programs		Voucher program
	Arizona	Minnesota	Los Angeles, California	Montgomery County, Maryland	Seattle, Washington
Appropriation	–	X	X	X	–
A percentage of revenue from a tax (e.g., sales, income, property, etc.)	–	–	–	–	X
A tax check-off program <sup>a</sup>	–	X	–	–	–
Fines collected for public financing program violations	X	–	–	–	–
A percentage of unrelated fines or fees collected by the state or locality	X	–	–	–	–
Interest from the program fund or account holding program funds	–	–	–	X	–
Initial qualifying contributions made to participating candidates	X	–	–	–	–
Unspent or reclaimed funds from participating candidates	X	–	X	X	–
Direct contributions to the program made by members of the public	–	–	–	X	–

X = the public campaign financing program has this characteristic  
 – = the public campaign financing program does not have this characteristic.

Source: GAO analysis of relevant laws, program documentation, and interviews with program officials. | GAO-25-106650

<sup>a</sup>A tax check-off program is a program where tax filers can indicate on their tax returns whether the government should allocate a set dollar amount to fund some or part of a public campaign financing program. For example, Minnesota’s tax check-off program allows residents to check a box on their tax returns to allocate \$5 from the state’s general fund to the general campaign account or to the account of a political party within the campaign account, which is then used to provide direct public subsidy payments to participating candidates.

A representative from one nongovernmental organization we spoke with noted that an otherwise well-designed program may become obsolete without sufficient and consistent funds. Program officials from all five locations stated they had not experienced any challenges in funding for their programs, and some noted the availability of mechanisms to accommodate potential budget shortfalls. For example, in Montgomery County officials have the flexibility to adjust the matching rate if the program funding would not be able to fully cover the matching payments for all participating candidates.<sup>14</sup> Officials in Seattle stated that a specific

<sup>14</sup>See Montgomery Cty., Md. Code, § 16-23(d).

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fixed dollar maximum amount of funding over a 10-year period was included in the initiative establishing the program and this amount is not adjusted for inflation.<sup>15</sup> They stated that a greater amount might be included in future authorizations to account for inflation.

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## Qualification and Participation Requirements

In addition to registering or qualifying for the ballot, all five programs included requirements for candidates to qualify for the program and, once qualified, additional requirements for participating candidates to be eligible to receive public funds, as shown in table 2. These include, for example, collecting a defined number of contributions to qualify for the program and adhering to spending limits as a participating candidate.

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<sup>15</sup>See Honest Elections Seattle Initiative No. 122, § 2 (2015).

**Table 2: Program Qualification and Participation Requirements for Public Campaign Financing Programs in Selected Locations**

Qualification and participation requirements	Grant programs		Matching funds programs		Voucher program
	Arizona	Minnesota	Los Angeles, California	Montgomery County, Maryland	Seattle, Washington
File an application and receive certification to participate from program or other government officials	X	X	X	X	X
Attend a training session specific to program participation	X	–	X	–	–
Collect a minimum number of qualifying signatures <sup>a</sup>	–	–	–	–	X
Collect a minimum number and/or amount of qualifying contributions	X	X	X	X	X
Limit total campaign spending to a certain amount	X	X	X	–	X
Limit amount and source of contributions allowed (for example, individual contributions above a set dollar amount) <sup>b</sup>	X	–	–	X	X
Limit the amount of money candidates can contribute to their own campaign	X	X	X	X	–
Be opposed by a candidate who is qualified to appear on the ballot	–	X <sup>c</sup>	X	X	–
Win the primary election/advance to the general election	–	X	–	–	–
Participate in a certain number of public debates	X	–	X	–	X
Return all or some portion of unspent public funds following the election	X	X	X	X	X
Provide closed captions and written descriptions for political ads to accommodate those with hearing or visual impairments	–	X	–	–	–

X = the public campaign financing program has this characteristic  
 – = the public campaign financing program does not have this characteristic.

Source: GAO analysis of relevant laws, program documentation, and interviews with program officials. | GAO-25-106650

<sup>a</sup>This row applies specifically to signatures required for program participation, exclusive of any signatures that might be required to qualify for the ballot.

<sup>b</sup>This row applies specifically to contribution limits required for program participation, exclusive of contribution limits that might apply to all candidates.

<sup>c</sup>Minnesota’s program requires that candidates have an opponent in either the primary or general election.



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**Qualification Requirements.** In four of five public campaign financing programs in our review, candidates can qualify for participation in the program during the primary or general elections, while in Minnesota, candidates are only qualified to receive a public subsidy payment if they win the primary election. In addition, programs in our review all had specific requirements each candidate must meet to qualify to participate in the program. For example, all five programs required candidates to collect a minimum number or dollar amount of qualifying contributions, or a minimum number of qualifying signatures.

For a contribution to be considered “qualifying” it must meet criteria specific to the program. For example, in Montgomery County, a qualifying contribution must be at least \$5 but no more than \$250, the contribution must be made after January 1 of the year after the last election for the same office, and the contributor must be a county resident, among other requirements.<sup>16</sup> In Seattle, qualifying signatures demonstrating support for a candidate, whether or not the signatory is able to make a qualifying financial donation, must be from city residents.<sup>17</sup> A report from one nongovernmental organization stated the reason for requiring a certain number of qualifying contributions or signatures is to ensure the candidate can demonstrate a threshold level of popular support.<sup>18</sup>

**Participation Requirements.** Once qualified to participate in a program, candidates must meet other requirements to receive public funding in all five locations we studied. Of the five selected programs

- Four required that participating candidates limit overall campaign spending to a certain amount,
- four required that candidates limit how much they contribute to their own campaign,
- three required that participating candidates limit the total amount of contributions they receive from any individual contributor, and
- three required candidates to participate in a certain number of public debates.

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<sup>16</sup>Montgomery Cty., Md. Code, § 16-18 (defining qualifying contribution).

<sup>17</sup>Seattle, Wash. Mun. Code, § 2.04.630(C).

<sup>18</sup>Catherine Hinckley Kelley and Austin Graham, *Buying Back Democracy: The Evolution of Public Financing in U.S. Election* (Washington, D.C., October 2018).

For example, in the 2021 election, participating at-large city council candidates in Seattle’s voucher program were required to agree not to spend more than a total of \$375,000 for their combined primary and general election campaigns.<sup>19</sup> Participating candidates in Los Angeles’ matching fund program are required to appear in a public debate or town hall event.<sup>20</sup>

**Oversight Mechanisms to Ensure Program Integrity**

Officials from all five public campaign financing programs we studied stated that the programs each had oversight mechanisms designed to ensure program integrity, as shown in table 3.

**Table 3: Oversight Mechanisms for Public Campaign Financing Programs in Selected Locations**

Oversight mechanisms to ensure program integrity	Grant programs		Matching funds programs		Voucher program
	Arizona	Minnesota	Los Angeles, California	Montgomery County, Maryland	Seattle, Washington
Individual contributions or other specific transactions are reviewed on an ongoing basis	X	X	X	X	X
Routine internal audits are conducted	X	X	X	X	X
Routine external audits are conducted	X	–	–	X	–
Fines can be issued for candidates who violate program regulations	X	X	X	X	X

X = the public campaign financing program has this characteristic  
 – = the public campaign financing program does not have this characteristic.

Source: GAO analysis of relevant laws, program documentation, and interviews with program officials. | GAO-25-106650

Specifically, according to program officials and program documents, all five programs have policies and procedures for reviewing required documentation for qualifying contributions, in part to determine if candidates are providing accurate and comprehensive documentation. For example, Seattle program officials told us that when reviewing documentation candidates submitted to qualify for the program during the 2017 election cycle, they identified a candidate who collected the required number of signatures from city residents but committed fraud. According to the officials, the candidate used personal money to meet the

<sup>19</sup>See Seattle, Wash. Mun. Code, § 2.04.634.

<sup>20</sup>L.A.M.C., § 49.7.23(c)(6).

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requirement that candidates collect a certain number of qualifying contributions from city residents.<sup>21</sup>

Montgomery County program officials described the procedures they used to review participating candidates' requests for matching funds payments. These procedures included reviewing specific contribution documentation to ensure that candidates are adhering to program rules (for example, that candidates only request matching funds for contributions from county residents), and that their requests for matching funds payments are legitimate (e.g., the documentation supports the request).

Further, officials from all five programs told us they conduct internal audits at regular intervals. For example, in Los Angeles, program officials are required by law to audit the campaigns of any candidates that receive public funds, as well as those of any candidates for whom \$100,000 or more was raised or for whom \$100,000 or more in expenditures was made.<sup>22</sup> Officials from Montgomery County stated that they conduct an internal review for each election cycle. In addition, as of October 2024, Montgomery County officials stated that an external audit of the county's public financing program during the 2022 election was being finalized. Going forward, they plan to continue this practice at regular intervals.

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<sup>21</sup>Program officials referred this candidate to the city attorney for prosecution.

<sup>22</sup>L.A. Charter, § 702(d); L.A.A.C., § 24.41.

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## Candidate Participation, Contributions, and Expenditures in Selected Public Campaign Financing Programs Varied by Location and Other Factors

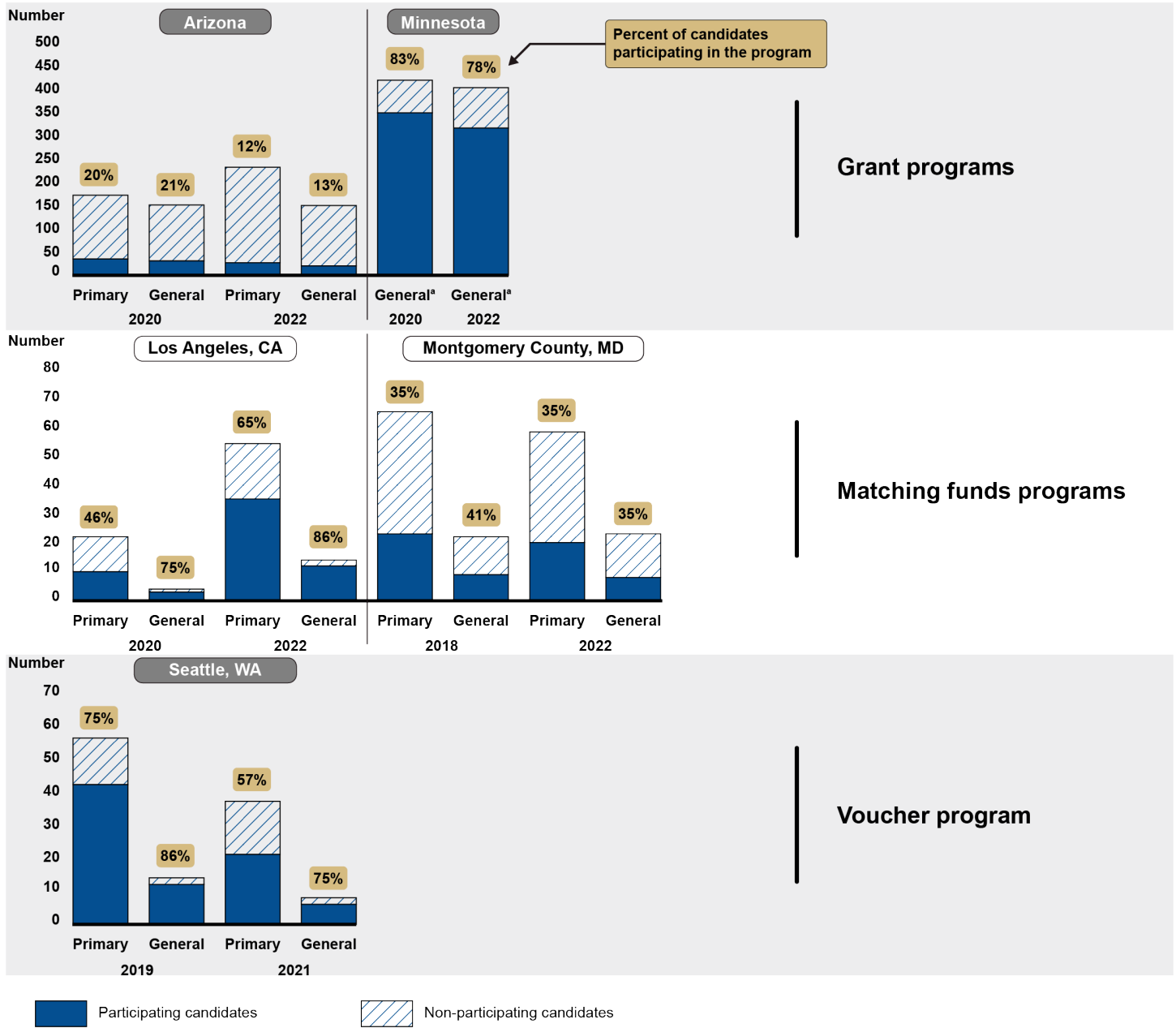
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### Candidate Participation Varied by Election and Candidate Characteristics; Most Contests Had At Least One Publicly Funded Candidate

We analyzed data on candidate program participation, election outcomes, and campaign finance for the two most recent elections in each location at the time of our analysis to provide insights on the use of these programs. Across the five locations, the percentage of candidates in a primary or general election who participated in the public campaign financing program ranged from about 12 to 86 percent of all candidates, as shown in figure 2. For example:

- Participation in the public campaign financing program in Montgomery County, Maryland, varied between about 35 and 41 percent during the primary and general elections in 2018 and 2022. Specifically, in 2018, there were 23 participating candidates in the primary and 9 in the general election; and in 2022, there were 20 participating candidates in the primary and 8 in the general election.
- In Seattle, participation rates were over 50 percent in the primary and general elections in 2019 and 2021, ranging from about 57 to 86 percent. Specifically, in 2019, there were 42 participating candidates in the primary and 12 in the general election; and in 2021, there were 21 participating candidates in the primary, and 6 in the general election.

**Figure 2: Number and Percentage of Candidates Who Participated or Did Not Participate in Public Campaign Financing Programs by Selected Location and Election**



Source: GAO analysis of public campaign financing program and elections data from selected locations. | GAO-25-106650

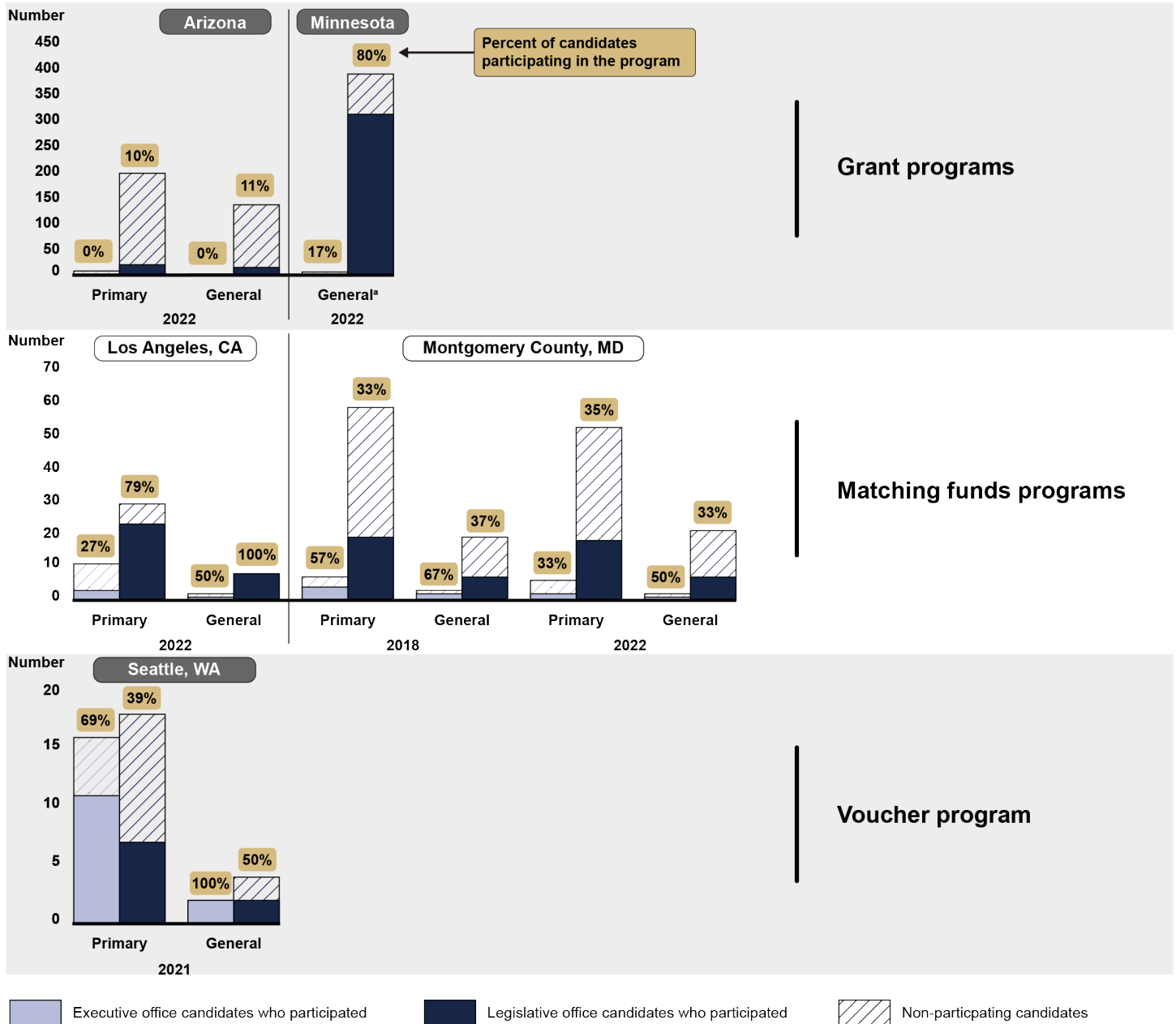
<sup>a</sup>Minnesota's public campaign financing program only issues public subsidy payments to candidates who will appear on the general election ballot. The program does not provide public subsidy payments for the primary election.

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**Executive and legislative offices sought.** As shown in figure 3, in three of the five locations, candidates for executive office (such as governor, mayor, or county executive) participated at lower rates than candidates for legislative office (such as state legislator or city or county councilmember) when both executive and legislative contests occurred. In the other two locations, candidates for executive office participated at similar or higher rates than candidates for legislative office. For example:

- In Los Angeles during the 2022 election, legislative candidates participated in the public campaign financing program at higher rates than executive candidates. Specifically, three of 11 mayoral candidates (about 27 percent) participated in the public campaign financing program in the primary and one of two candidates (50 percent) participated in the general election, while 23 of 29 city council candidates (about 79 percent) participated in the primary and all eight city council candidates (100 percent) participated in the general election in that year.
- Similarly, in Minnesota during the 2022 general election, one of six gubernatorial candidates (about 17 percent) participated in the public campaign financing program, while 311 of 389 state legislative candidates (about 80 percent) participated in the program.
- In Seattle, program participation rates were higher for mayoral candidates compared to city council candidates during the 2021 election. Specifically, 11 of 16 mayoral candidates (about 69 percent) participated in the primary, and both mayoral candidates (100 percent) participated in the general election. Seven of 18 city council candidates (about 39 percent) participated in the primary and two of four city council candidates (50 percent) participated in the general election.

**Figure 3: Number and Percentage of Executive and Legislative Candidates Who Participated in Public Campaign Financing Programs by Selected Location and Election**



Source: GAO analysis of public campaign financing program and elections data from selected locations. | GAO-25-106650

Note: For the purposes of this analysis, we define executive candidates as those running for the offices of governor in Arizona and Minnesota, mayor in Los Angeles and Seattle, and county executive in Montgomery County. We define legislative candidates as those running for the offices of

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state senate and house of representatives in Arizona and Minnesota, city council member in Los Angeles and Seattle, and county council member in Montgomery County.

<sup>a</sup>Minnesota's public campaign financing program only issues public subsidy payments to candidates who will appear on the general election ballot. The program does not provide public subsidy payments for the primary election.

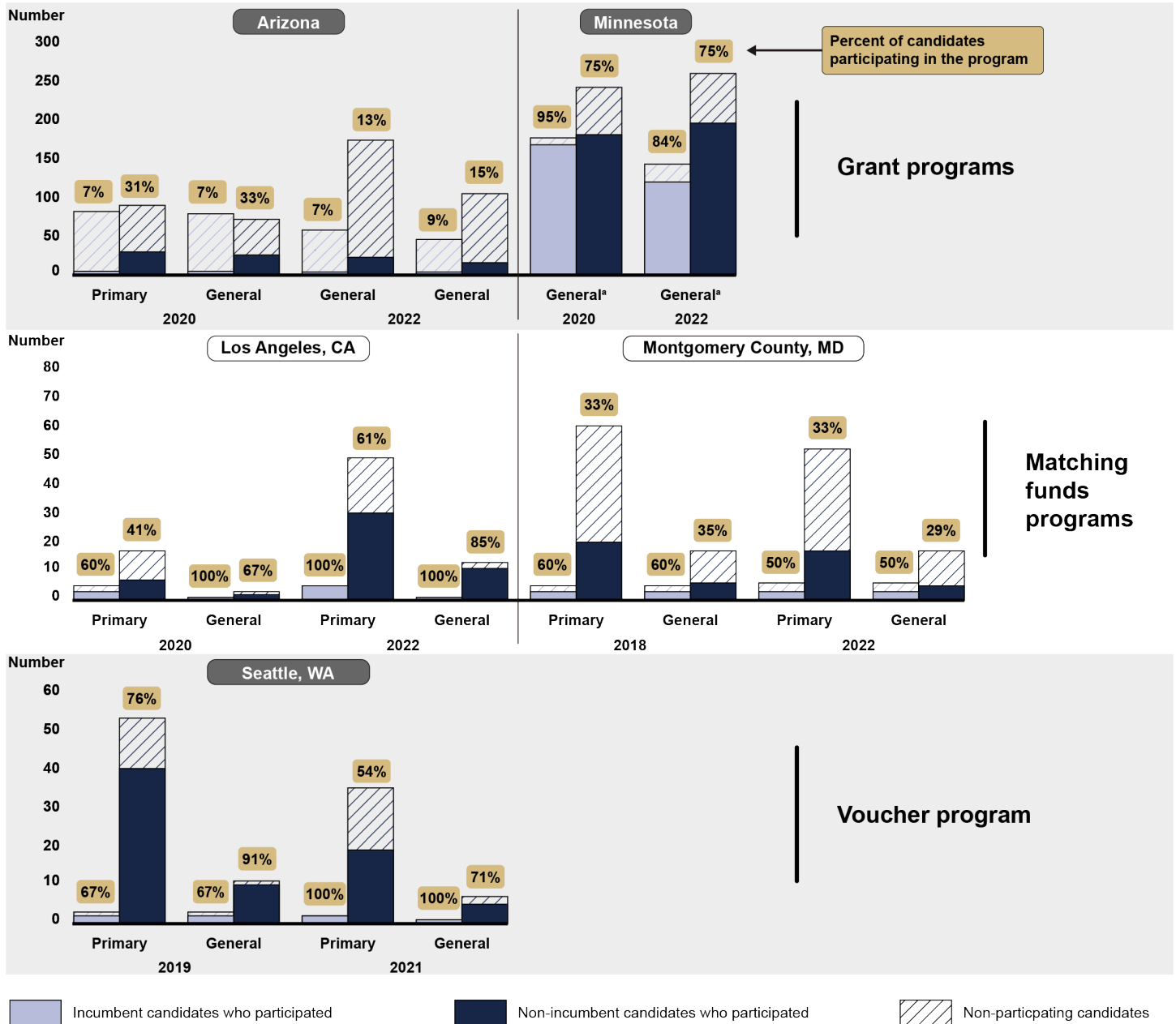
**Candidate experience.** We analyzed candidate participation by candidate experience, specifically whether candidates were incumbents or first-time candidates. With regard to incumbents, in four of the five selected locations at least 50 percent of incumbent candidates participated in the public campaign financing program in each election, as shown in figure 4. In addition, we found that in these four locations incumbents participated in the public campaign financing program at higher rates than non-incumbents in all but one election cycle we reviewed in our case study locations.<sup>23</sup> For example, in Minnesota about 95 percent of incumbents (168 candidates) participated in the public campaign financing program in the 2020 general election compared to 75 percent (181 candidates) of non-incumbents. Further, about 84 percent of incumbents (120 candidates) participated in the public campaign financing program in the 2022 general election, compared to 74 percent (196 candidates) of non-incumbents. In Arizona, the percent of incumbents who participated in the public campaign financing program during each of the 2020 and 2022 primary and general elections ranged from about 7 to 9 percent (5 candidates in both the 2020 primary and general elections, and 4 candidates in both the 2022 primary and general elections). Non-incumbent participation ranged from about 13 to 33 percent during these elections (a range of 16 to 30 candidates).

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<sup>23</sup>The exception is Seattle's 2019 primary and general elections where non-incumbents participated more than incumbents.



**Figure 4: Number and Percentage of Incumbent and Non-Incumbent Candidates Who Participated in Public Campaign Financing Programs by Selected Location and Election**



Source: GAO analysis of public campaign financing program and elections data from selected locations. | GAO-25-106650

<sup>a</sup>Minnesota's public campaign financing program only issues public subsidy payments to candidates who will appear on the general election ballot. The program does not provide public subsidy payments for the primary election.

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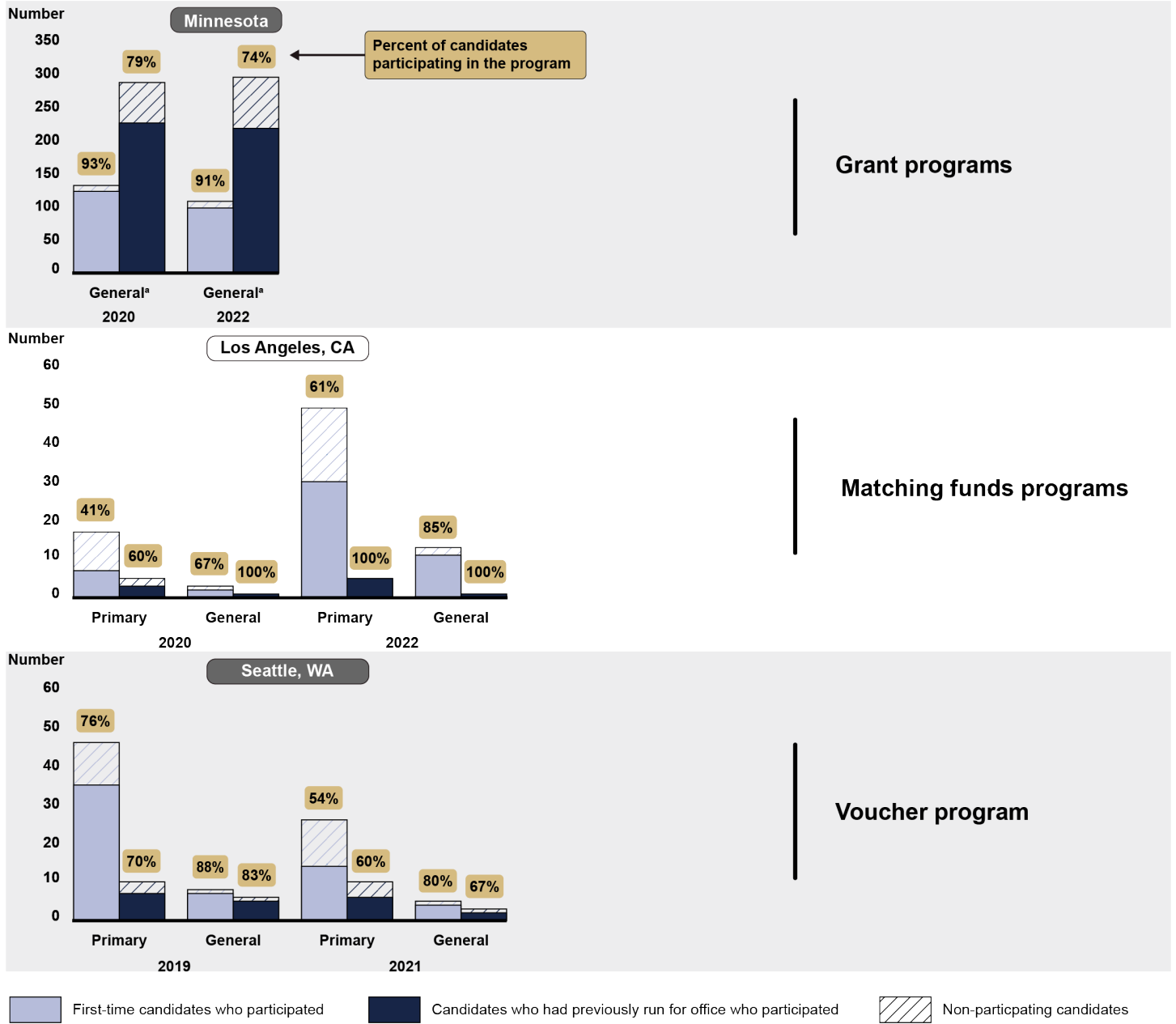
With regard to first-time candidates, over 50 percent of these candidates participated in the public campaign financing program in the three case study locations where these data were available (Minnesota, Los Angeles and Seattle), as shown in figure 5.<sup>24</sup> We also compared the participation rate of first-time candidates to the participation rate of candidates who had previously run for office. We did not observe a consistent pattern in our study locations. Rather, we found variation by election and location. For example:

- In Minnesota first-time candidates participated at higher rates than candidates who had previously run for office in both the 2020 and 2022 elections. Specifically, about 93 percent (123 candidates) of first-time candidates, compared to 79 percent (226 candidates) of candidates who had previously run, participated in the public campaign financing program in the 2020 general election. In addition, about 91 percent (98 candidates) of first-time candidates, compared to about 74 percent (218 candidates) of candidates who had previously run, participated in the 2022 general election.
- In Seattle, during the 2019 primary and general elections, first-time candidates participated at higher rates compared to candidates who had previously run. Specifically, in the 2019 primary and general elections, about 76 percent (35 candidates) and 88 percent (7 candidates) of first-time candidates participated, respectively, compared to 70 percent (7 candidates) and 83 percent (5 candidates) of candidates who had previously run. However, during the 2021 primary election, first-time candidates participated at a lower rate compared to candidates who had previously run—about 54 percent (14 candidates) of first-time candidates compared to about 60 percent (6 candidates) of candidates who had previously run. And in the 2021 general election first-time candidates participated at a higher rate than candidates who had previously run—about 80 percent (4 candidates) compared to about 67 percent (2 candidates).

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<sup>24</sup>Data on first-time candidates were not available in Arizona or Montgomery County.

**Figure 5: Number and Percentage of First-time Candidates and Candidates Who Had Previously Run Who Participated in Public Campaign Financing Programs by Selected Location and Election**



Source: GAO analysis of public campaign financing program and elections data from selected locations. | GAO-25-106650

<sup>a</sup>Minnesota's public campaign financing program only issues public subsidy payments to candidates who will appear on the general election ballot. The program does not provide public subsidy

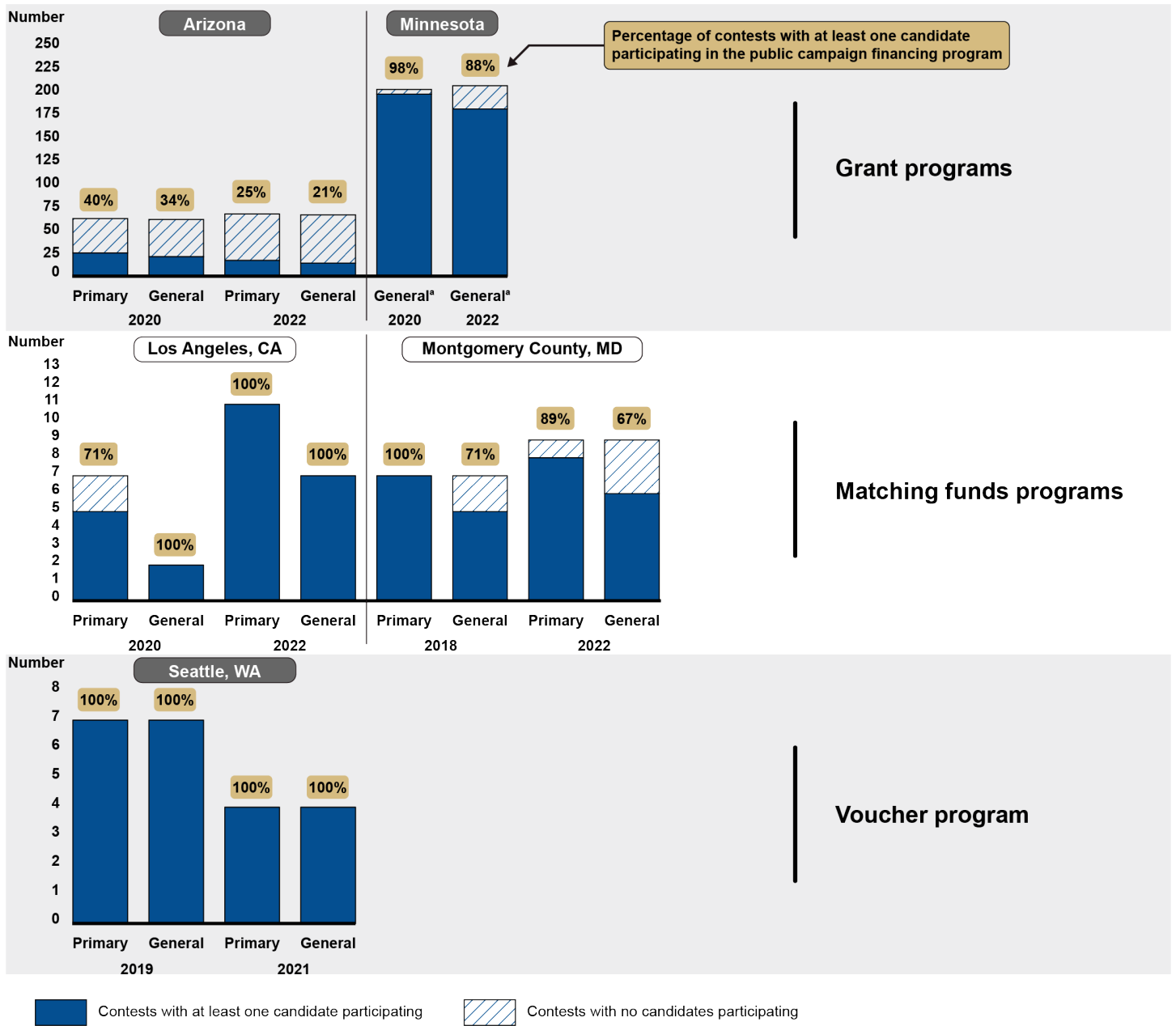
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payments for the primary election. Further, data on first-time candidacy were not available in Arizona or Montgomery County, Maryland.

**Contests for the offices eligible for public financing.** For each case study location, we analyzed candidate participation in the public campaign financing program for each of the contests for the offices eligible for public financing. Specifically, we analyzed the percentage of all contests in which at least one candidate participated in the program.

As shown in figure 6, our analysis showed that the majority of contests in four of five locations had at least one candidate who participated in the public campaign financing program. For example, in Seattle at least one participating candidate ran in every contest during all four elections. In Arizona, most contests did not have any candidates participating in the public campaign financing program. Specifically, during the primary and general elections in 2020 and 2022, between 21 and 40 percent of contests (14 to 25 contests) had at least one participating candidate.

**Figure 6: Number and Percentage of Contests with At Least One Participating Candidate by Selected Location and Election**



Source: GAO analysis of public campaign financing program and elections data from selected locations. | GAO-25-106650

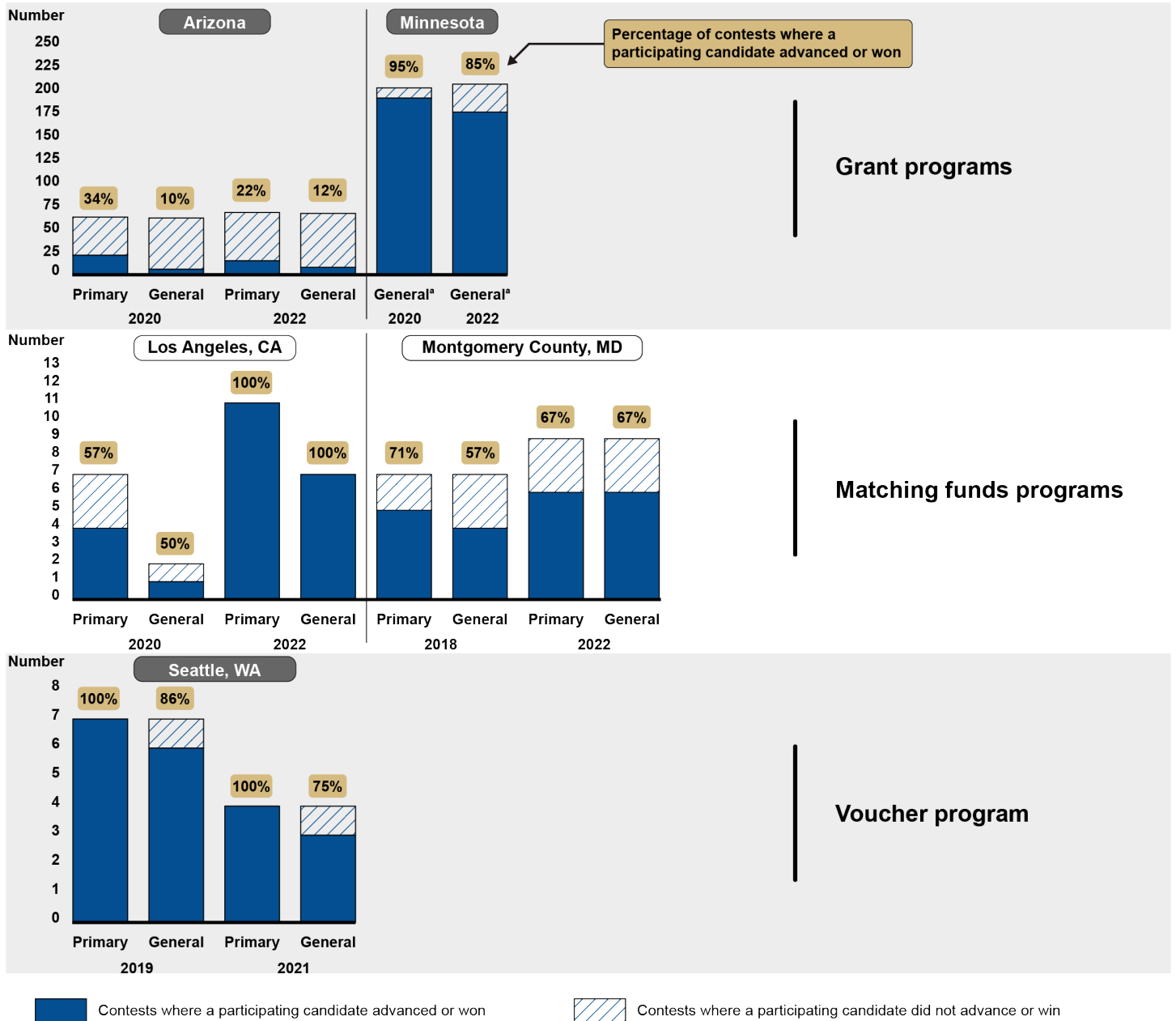
<sup>a</sup>Minnesota's public campaign financing program only issues public subsidy payments to candidates who will appear on the general election ballot. The program does not provide public subsidy payments for the primary election.

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We also analyzed the percentage of contests won by a participating candidate (either advanced in their primary contest or won the general contest) in each election for each selected location. We found that a participating candidate won or advanced in at least 50 percent of contests, in all primary and general elections, in four of the five selected locations—Minnesota; Los Angeles; Montgomery County; and Seattle. The percentage of all contests in which a participating candidate won the election—or advanced from a primary to a general election—varied by election and location, as shown in figure 7. For example:

- In Minnesota, in the 2020 general election, a participating candidate won in about 95 percent (190 contests) of all contests, and in the 2022 general election, a participating candidate won in about 85 percent (175 contests) of all contests.
- In Los Angeles, during the 2020 election cycle, a participating candidate advanced in about 57 percent (4 contests) of all primary contests, and won in about 50 percent (1 contest) of all general election contests. In the 2022 election cycle, a participating candidate advanced in all primary contests (11 contests), and won in all general election contests (7 contests).
- In Arizona, during the 2020 election cycle, a participating candidate advanced in about 34 percent (21 contests) of all primary contests, and won in about 10 percent (6 contests) of general election contests. During the 2022 election cycle, a participating candidate advanced in about 22 percent (15 contests) of all primary contests, and won in about 12 percent (8 contests) of general election contests.

**Figure 7: Number and Percentage of Contests Won by a Participating Candidate by Selected Location and Election**



Source: GAO analysis of public campaign financing program and elections data from selected locations. | GAO-25-106650

<sup>a</sup>Minnesota's public campaign financing program only issues public subsidy payments to candidates who will appear on the general election ballot. The program does not provide public subsidy payments for the primary election.

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Participating Candidates  
Received Relatively More  
Small Contributions;  
Average Candidate  
Expenditures Varied by  
Program and Office Type

We analyzed campaign finance data from each program to describe the amount of public funds received, the average number and size of contributions received, and the total amount of expenditures made by candidates in each case study location and by program model—grant programs, matching funds programs, and voucher programs.

Grant programs

As part of our analysis of the two selected grant programs in Arizona and Minnesota, we analyzed the average dollar amount that participating candidates received in public funds grants. In both Arizona and Minnesota, average grant amounts differed by the office sought by the participating candidate. Further, these amounts differed given the type of grant program each location has implemented. For example, Arizona has a “full” grant program, meaning public funds are generally intended to cover all campaign spending during the primary and general election for participating candidates. In exchange, candidates agree not to accept private contributions starting one week before the primary election.<sup>25</sup> Minnesota has a “partial” grant program, meaning public campaign financing is only available for general elections, and candidates may accept private contributions in addition to public funds.

- In Arizona, participating candidates for state legislature received an average of about \$40,600 in public funding in 2020 and \$36,800 in public funding in 2022. Participating candidates running for other offices, such as secretary of state and state treasurer, received an average about \$270,700 and \$229,300 in 2020 and 2022, respectively. Although there was a gubernatorial election in Arizona in 2022, no candidates participated in the program during that election.
- We found that participating candidates for the Minnesota state legislature received an average of about \$6,100 in public funds in 2020 and \$4,700 in public funds in 2022. By comparison, there was one gubernatorial candidate who participated in the program in 2022, who received about \$584,000 in public funds. As stated above, Minnesota’s program offers partial grants to help candidates who will appear on the general election ballot fund their campaigns after the primary election through the general election.

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<sup>25</sup>Participating candidates in Arizona may collect early contributions, which are subject to limits, up until one week before the primary election.



Table 4 provides information on public funds received by candidates who participated in programs in Arizona and Minnesota. See appendix II for more information on these programs.

**Table 4: Average Public Funds Received by Each Participating Candidate for Candidates Participating in Arizona and Minnesota Public Campaign Financing Programs (2020, 2022 Elections)**

Office	Arizona (Primary and general elections)		Minnesota (General elections only) <sup>a</sup>	
	2020	2022	2020	2022
State legislature	\$40,638	\$36,805	\$6,108	\$4,716
Governor	N/A <sup>b</sup>	N/A <sup>c</sup>	N/A <sup>b</sup>	\$584,034
Other offices <sup>d</sup>	\$270,704	\$229,303	N/A <sup>b</sup>	\$74,535

Source: GAO analysis of public campaign financing program and elections data from the Arizona State Elections Funds Portal website, and Minnesota Campaign Finance and Public Disclosure Board officials. | GAO-25-106650

<sup>a</sup>Minnesota’s public campaign financing program only issues public subsidy payments to candidates who will appear on the general election ballot. The program does not provide public subsidy payments for the primary election.

<sup>b</sup>Not applicable. There were no elections for these offices in these election years.

<sup>c</sup>Not applicable. In Arizona in 2022, there were no candidates for governor who participated in the public campaign financing program.

<sup>d</sup>In Arizona, these offices included corporation commissioner in 2020, and attorney general, corporation commissioner, secretary of state, state mine inspector, state treasurer, and superintendent of public instruction in 2022. In Minnesota, these offices included attorney general, secretary of state, and state auditor.

We also analyzed average reported expenditures made by participating versus nonparticipating candidates based on office sought, such as state legislature or governor, and by election. We did not find a consistent pattern of candidate spending across the Arizona and Minnesota programs, and there are a variety of differences in the programs—such as the full-grant program in Arizona compared to the partial-grant program in Minnesota—that may contribute to these results, among other factors.

- In Arizona, we found that on average, where comparisons could be made, candidates who participated in the public financing program in the 2020 and 2022 elections spent less than those who did not participate. We found that participating candidates spent 57 to 80 percent less on average than non-participating candidates running for similar offices during the same elections. For example, candidates for the state legislature who participated in the program during the 2022 election averaged \$44,653 in reported expenditures while those who did not participate averaged \$112,263.

- In Minnesota, we found that among candidates for state legislature and governor, candidates who participated in the public financing program spent more than those who did not participate, during the 2020 and 2022 elections.

Table 5 provides information on the average campaign expenditures reported by candidates in Arizona’s and Minnesota’s public campaign financing programs. See appendix II for more information on programs in these two states.

**Table 5: Average Campaign Expenditures Reported by Candidates Participating and Not Participating in Public Campaign Financing Programs in Arizona and Minnesota (2020, 2022 Elections)**

Location	Election year	Office	Average campaign spending per candidate (\$)	
			Candidates participating in the program	Candidates not participating in the program
Arizona	2020	State legislature	\$44,653	\$112,263
		Other offices <sup>a</sup>	\$283,096	N/A <sup>b</sup>
	2022	State legislature	\$41,158	\$95,092
		Governor	N/A <sup>b</sup>	\$7,542,802
		Other offices <sup>a</sup>	\$249,258	\$1,203,256
Minnesota	2020	State legislature	\$40,071	\$25,624
	2022	State legislature	\$44,588	\$42,751
		Governor	\$5,458,005	\$5,039,428
		Other offices <sup>a</sup>	\$680,483	\$1,117,563

Source: GAO analysis of public campaign financing program and elections data from the Arizona State Election Funds Portal website, and Minnesota Campaign Finance and Public Disclosure Board officials. | GAO-25-106650

<sup>a</sup>In Arizona, these offices included corporation commissioner in 2020 and attorney general, corporation commissioner, secretary of state, state mine inspector, state treasurer, and superintendent of public instruction in 2022. In Minnesota, these offices included attorney general, secretary of state, and state auditor.

<sup>b</sup>Not applicable. In these years no candidates participated in the public campaign financing program in contests for these offices.

### Matching funds programs

For the two selected matching funds programs we studied—Los Angeles and Montgomery County—our analysis showed that program participants seeking a chief executive office received more public funds than those running for city or county council. Both programs place limits on the maximum amount of public funding a candidate can receive. For example:

- In Los Angeles, program participants on average received about \$199,000 and \$198,000 in public funds for city council contests in the

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2020 and 2022 elections, respectively, and about \$1.284 million in public funds for the mayoral election in 2022.<sup>26</sup>

- In Montgomery County, program participants on average received about \$70,000 and \$81,000 in public funds for county council district contests; about \$176,000 and \$207,000 for at-large county council contests; and about \$666,000 and \$804,000 for county executive contests in the 2018 and 2022 elections, respectively.<sup>27</sup>

Table 6 provides information on public funds received for candidates who participated in public campaign financing programs in Los Angeles and Montgomery County. See appendix II for more information on these two programs.

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<sup>26</sup>There were no mayoral elections in 2020. In the 2022 election cycle in Los Angeles, city council candidates could receive a maximum of \$161,000 in public funds for a primary election and \$201,000 in public funds for a general election, and mayoral candidates could receive a maximum of \$1,071,000 in public funds for a primary election and \$1,284,000 in public funds for a general election. See L.A.M.C., § 49.7.29.

<sup>27</sup>For each of the primary and general elections in the 2018 and 2022 election cycles in Montgomery County, Maryland, county council district candidates could receive a maximum of \$125,000 in public funds, county council at-large candidates could receive a maximum of \$250,000 in public funds, and county executive candidates could receive a maximum of \$750,000 in public funds. Montgomery Cty., Md. Code, § 16-23(a)(3).

**Table 6: Average and Total Public Funds Received by Participating Candidates in Los Angeles, CA and Montgomery County, MD Public Campaign Financing Programs, by Office and Election Year**

Location	Election cycle	Office	Average public funds received per participating candidate	Number of participating candidates	Total public funds received by all participating candidates
Los Angeles	2020 <sup>a</sup>	City council	\$199,263	10	\$1,992,626
	2022	City council	\$198,151	24	\$4,755,621
		Mayor	\$1,284,158	3	\$3,852,475
		Other offices <sup>b</sup>	\$461,476	9	\$4,153,283
Montgomery County	2018	County council – district	\$69,713	7	\$487,991
		County council – at large	\$175,981	12	\$2,111,774
		County executive	\$665,930	4	\$2,663,721
	2022	County council – district	\$80,660	13	\$1,048,575
		County council – at large	\$207,075	5	\$1,035,375
		County executive	\$804,068	2	\$1,608,137

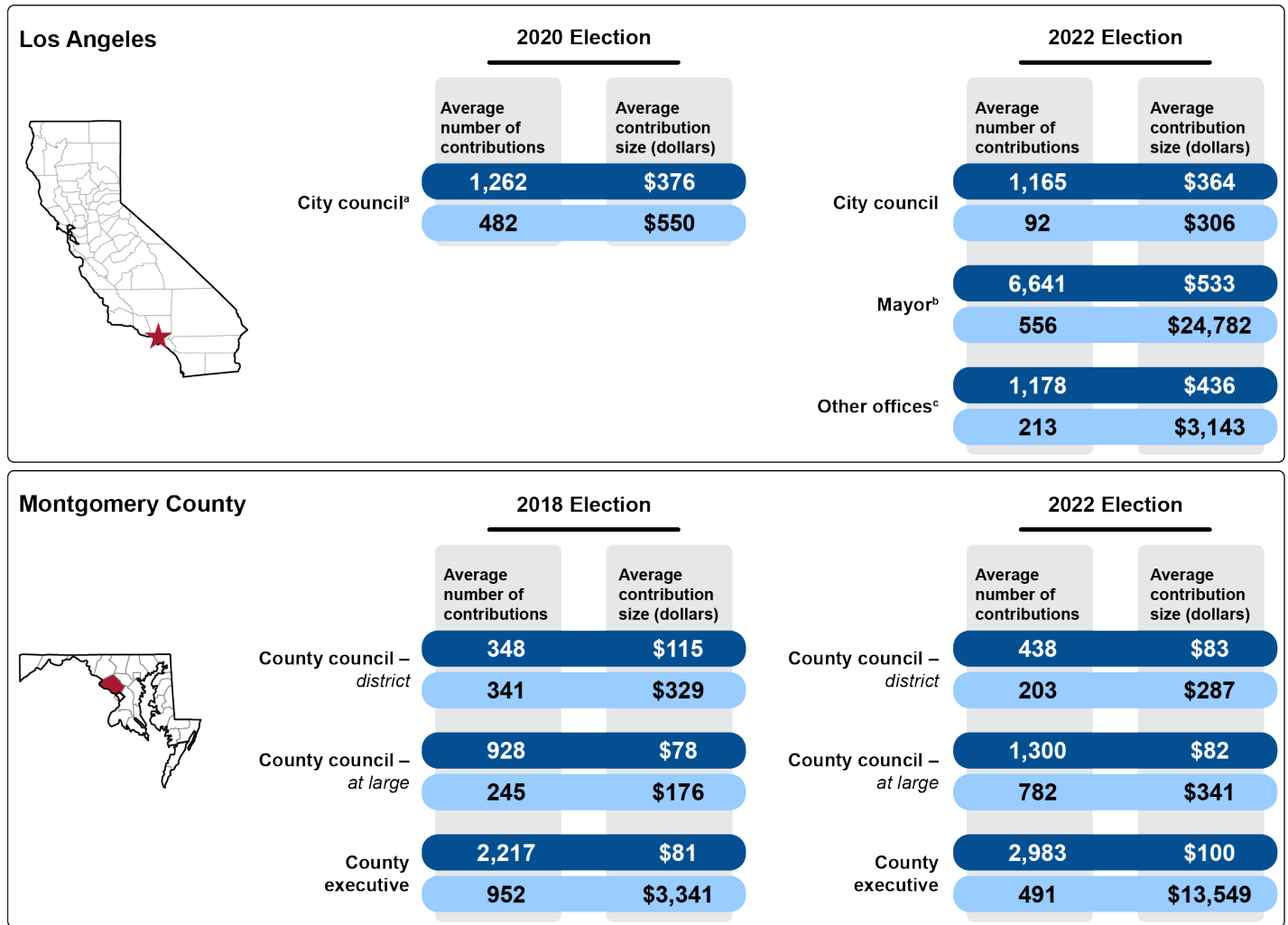
Source: GAO analysis of public campaign financing program and elections data from Los Angeles City Ethics Commission officials, and Montgomery County Department of Finance officials. | GAO-25-106650

<sup>a</sup>There were no elections for mayor or other offices eligible for public campaign financing in Los Angeles in 2020.

<sup>b</sup>These offices included city attorney and controller.

As shown in figure 8, in both matching funds programs we studied, public campaign financing program participants, on average, generally received a higher number of smaller contributions, compared to candidates running for the same office who did not participate in the program. For example, in the 2022 election in Los Angeles, each participating candidate for mayor received an average of about 6,600 contributions of about \$530 each, compared to non-participating candidates for mayor who received an average of about 560 contributions of almost \$25,000 each.

**Figure 8: Average Contributions Received By Candidates Participating and Not Participating in the Los Angeles, CA and Montgomery County, MD Public Campaign Financing Programs**



Participating candidates
  Non-participating candidates

Source: GAO analysis of public campaign financing program and elections data from the Los Angeles City Ethics Commission, and Montgomery County Department of Finance officials; U.S. Census Bureau (maps). | GAO-25-106650

<sup>a</sup>There were no elections for mayor or other offices eligible for public campaign financing in Los Angeles in 2020.

<sup>b</sup>Although the contribution limit for the mayoral campaign in Los Angeles in 2022 was \$1,500, there is no limit to the amount that non-participating candidates may contribute to their own campaigns. See L.A. Charter, § 470. In contrast, participating mayoral candidates in the 2022 election could contribute up to \$148,100 of their personal funds. L.A.M.C., § 49.7.23(C)(5).

<sup>c</sup>These offices included city attorney and controller.

We also analyzed average expenditures made by participating versus nonparticipating candidates based on office sought—such as city and county council, mayor, or county executive—and election. Although our analysis showed that candidates for mayor and county executive spent more on their campaigns compared to candidates for other offices, we found differences in spending depending on whether the candidates participated in the program. See table 7.

- In Los Angeles, program participants running for mayor spent less on average compared to mayoral candidates who did not participate in the program. But program participants running for city council spent more on average than non-participating city council candidates.
- Candidate spending in Montgomery County also followed this pattern. Specifically, program participants running for county executive spent less on average compared to county executive candidates who did not participate in the program. Conversely, program participants running for county council outspent their non-participating counterparts, on average.

**Table 7: Average Campaign Expenditures Reported by Candidates Participating and Not Participating in Public Campaign Financing Programs in Los Angeles, CA and Montgomery County, MD**

Location	Election year	Office	Average campaign spending per candidate (\$)	
			Candidates participating in the program <sup>a</sup>	Candidates not participating in the program
Los Angeles	2020	City council	\$677,020	\$271,108
	2022	City council	\$633,412	\$28,464
		Mayor	\$4,881,304	\$13,833,432
		Other office <sup>b</sup>	\$981,281	\$685,005
Montgomery County	2018	County council – district	\$103,675	\$98,777
		County council – at large	\$246,562	\$54,613
		County executive	\$828,595	\$1,990,309
	2022	County council – district	\$119,791	\$35,447
		County council – at large	\$310,444	\$285,294
		County executive	\$1,125,243	\$3,461,801

Source: GAO analysis of public campaign financing program and elections data from Los Angeles City Ethics Commission officials, and Montgomery County Department of Finance officials. | GAO-25-106650

<sup>a</sup>As part of Los Angeles’s public campaign financing program, participating candidates agreed to adhere to campaign spending limits. Specifically, in 2020, combined primary and general election spending limits were: \$985,000 for city council candidates. In 2022, combined primary and general election spending limits were: \$1,047,000 for city council; \$5,991,000 for mayor; \$2,497,000 for controller; and \$2,332,000 for city attorney. There are no spending limits that apply in Montgomery County’s public campaign financing program.

<sup>b</sup>These offices included city attorney and controller.

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## Voucher program

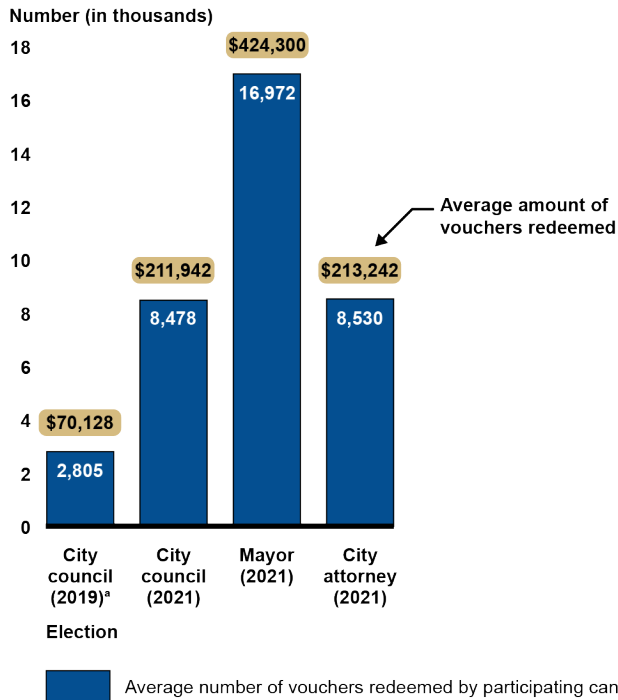
Candidates who participated in Seattle's voucher program redeemed each voucher they received from a resident for \$25 in both the 2019 and 2021 elections.<sup>28</sup> For city council elections, the average number of vouchers redeemed by participating candidates was about 2,800 in 2019 and 8,500 in 2021. One reason for this difference may be that the city council seats up for election in 2019 were district-level seats, while those up for election in 2021 were citywide seats.<sup>29</sup> Figure 9 shows information on the average number and dollar amounts of vouchers redeemed by candidates in the 2019 and 2021 elections. For more information on Seattle's program see appendix II.

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<sup>28</sup>According to the Seattle public campaign financing program's biennial reports, the program mailed packets of four vouchers worth \$25 each to about 476,000 residents for the 2019 election and about 513,000 residents for the 2021 election. According to Seattle program officials, there have been instances where vouchers were assigned by residents to a candidate but could not be redeemed because the candidate had already redeemed the maximum number of vouchers allowed.

<sup>29</sup>Seattle's city council includes seven councilmembers who represent individual districts, and two citywide councilmembers representing the entire city. Participating candidates for citywide councilmember seats are permitted to redeem approximately 18,000 vouchers during an election cycle while candidates for district councilmember seats are permitted to redeem approximately 9,000 vouchers during an election cycle, with certain limitations.

**Figure 9: Average Number and Value of Vouchers Redeemed by Candidates Participating in the Seattle, WA Public Campaign Financing Program, By Office (2019, 2021 Elections)**



Source: GAO analysis of Seattle Ethics and Election Commission Democracy Voucher Program data. | GAO-25-106650

<sup>a</sup>In 2019, there were only elections for district-level city council members, while the 2021 elections were for citywide city council members as well as mayor and city attorney.

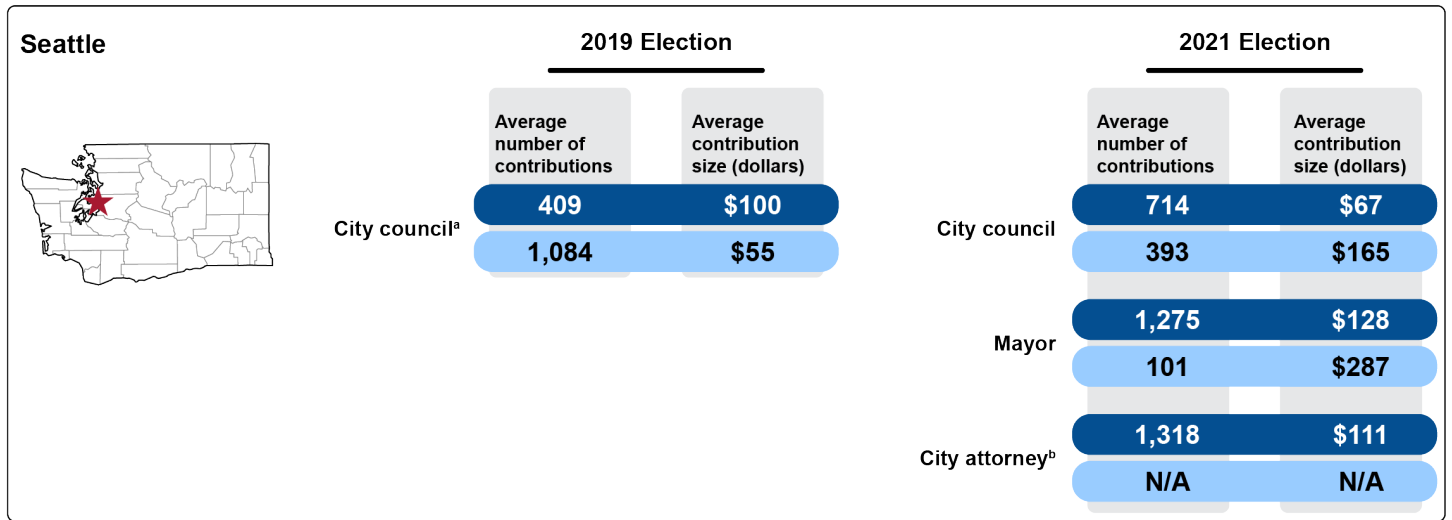
Participating candidates in the Seattle mayoral election received about twice as many vouchers as participating candidates in elections for other offices in the same year. In 2021, mayoral candidates received on average about 17,000 vouchers (totaling about \$424,000 in public funds) compared to citywide city council and city attorney candidates in the same year, who received on average about 8,500 vouchers (totaling about \$212,000 and \$213,000 in public funds per candidate, respectively).

During the 2019 election, candidates who participated in the program received fewer non-voucher contributions compared to candidates who did not participate. However, in the 2021 election this pattern was reversed and on average, candidates participating in the voucher



program received more non-voucher contributions and these contributions were smaller in size, as shown in figure 10.

**Figure 10: Average Number and Size of Non-voucher Contributions Received By Candidates Participating and Not Participating in the Seattle, WA Public Campaign Financing Program**



Participating candidates
  Non-participating candidates

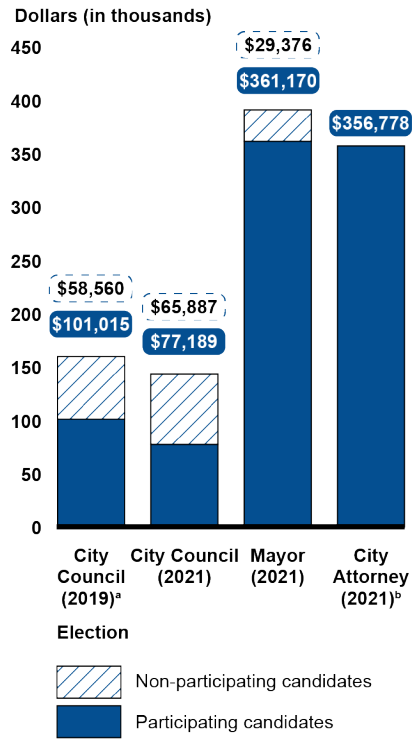
Source: GAO analysis of Seattle Ethics and Election Commission election and Democracy Voucher Program data; U.S. Census Bureau (map). | GAO-25-106650

<sup>a</sup>In 2019, there were only elections for district-level city council members, while the 2021 elections were for citywide city council members as well as mayor and city attorney.

<sup>b</sup>All candidates for city attorney participated in Seattle's public campaign financing program.

Further, as shown in figure 11, candidates participating in the voucher program spent a higher average amount in both 2019 and 2021 than candidates who did not participate.

**Figure 11: Average Campaign Expenditures Reported by Candidates Participating and Not Participating in the Seattle, WA Public Campaign Financing Program (2019, 2021 Elections)**



Source: GAO analysis of Seattle Ethics and Election Commission election and Democracy Voucher Program data. | GAO-25-106650

Note: As part of Seattle's public campaign financing program rules, participating candidates agreed to adhere to the following spending limits for both primary and general elections: \$800,000 for mayor; \$375,000 for city attorney, \$375,000 for city council - citywide \$375,000, and \$187,500 for city council - district.

<sup>a</sup>In 2019, there were only elections for district-level city council members, while the 2021 elections were for citywide city council members as well as mayor and city attorney.

<sup>b</sup>All candidates for city attorney participated in Seattle's public campaign financing program.

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## Certain Factors Can Affect the Structure and Participation Rates of Campaign Finance Programs, and Perspectives on Program Effects Varied

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### Legal Frameworks, Other Locations' Programs, and Lessons Learned Can Affect Program Structure

To understand the factors affecting the structure of campaign finance programs, we interviewed program officials and reviewed program documentation from nine locations (our five case studies and four additional locations).<sup>30</sup> We found that the structure of public campaign financing programs is determined by the program's legal framework (including relevant court decisions), and may be influenced by observations of other locations' programs and lessons learned during implementation of the programs.

#### Legal Framework

A jurisdiction's legal framework determines the key aspects of a public campaign financing program's structure. This framework can include both the laws that created the program and relevant court decisions.

The campaign finance programs we reviewed were created by initiatives enacted by voters, or enacted by state legislatures or local elected officials. The extent to which these laws included specific instructions about how to implement the programs varied. For example, the ballot measure that established Arizona's public financing program contained specific directions for how the program should be implemented, such as how many qualifying contributions candidates must collect to participate in the program and how much funding they may receive.<sup>31</sup> By comparison, the constitutional amendment that created Hawaii's public financing program instructed the legislature to establish a fund for the

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<sup>30</sup>These four additional locations are Hawaii; Maine; Albuquerque, New Mexico; and Washington, D.C.

<sup>31</sup>Arizona Citizens Clean Elections Act, A.R.S. § 16-940 *et seq.*

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partial public financing of state campaigns, among other things, but did not prescribe more specific features of the program.<sup>32</sup>

The legal framework within which programs are created can also determine the roles and responsibilities of state and local officials as they implement a public campaign financing program. For example, responsibilities for managing the program in Montgomery County, Maryland, are divided between the county and state. The program was established by the county after a 2013 Maryland state law authorized counties to create public campaign financing programs. Under statute, the county is responsible for funding the program and disbursing payments to candidates, while state officials are responsible for certifying whether candidates qualify to participate and for reviewing their claims for matching funds, among other things.<sup>33</sup>

State officials said the state's law was structured this way so that the state could provide centralized, consistent oversight for any county that chooses to implement a public campaign financing program. They stated that candidates in Maryland are already required to submit financial reports to the State Board of Elections; therefore, the shared oversight structure avoids the duplication of requiring candidates to report campaign finance data to both the county and the state. However, state and county officials said that state officials have found the process of reviewing candidate claims for matching funds to be more burdensome than they expected. After the 2018 election, to help address this issue, county officials began assisting state officials with reviewing some candidate claims, where needed.

Court decisions have also affected the structure of public campaign financing programs. For example, as we discussed in our 2010 report, Arizona's and Maine's programs included triggered matching provisions, in which participating candidates received matching funds when they were outspent by nonparticipating candidates.<sup>34</sup> In 2011, in *Arizona Free Enterprise Club v. Bennett*, the Supreme Court found Arizona's triggered

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<sup>32</sup>Haw. Const., art. II, § 5.

<sup>33</sup>Montgomery Cty., Md. Code, art. IV.

<sup>34</sup>[GAO-10-390](#).

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Observations of Other Programs

matching provision unconstitutional under the First Amendment.<sup>35</sup> As a result, public campaign financing programs we reviewed in Arizona and Maine that previously had such triggered matching provisions no longer include them, though they can include spending limitations for participating candidates.

Officials from three of the nine locations we interviewed told us their observations of campaign financing programs in other states and localities influenced aspects of their program structure. Officials may research or review other public campaign financing programs when determining the initial legal framework or when implementing later changes to their program.

For example, program officials from Washington, D.C., said their public campaign financing program was modeled after New York City's program, with allowances for D.C.'s smaller size and different municipal structure. While New York City uses a matching funds model, D.C.'s program combines matching funds with grant payments.<sup>36</sup> Program officials told us they saw benefits to the matching funds programs, but also wanted to provide seed money that would allow candidates to campaign before they had generated matching funds.

As another example, the law authorizing Montgomery County's program also created a committee responsible for recommending funding levels for the public campaign financing program.<sup>37</sup> In its first annual report, the committee wrote that it arrived at a recommendation by studying how other programs nationwide determined their funding levels.

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<sup>35</sup>*Arizona Free Enterprise Club v. Bennett* struck down an Arizona law that required that matching funds be provided to a publicly financed candidate if a privately financed candidate's contributions, combined with certain independent expenditures, exceeded the allotment of state funds to the publicly financed candidate. The Court said this part of Arizona's public financing program impermissibly forced privately funded candidates and independent political organizations to restrain their spending, which infringed on their First Amendment rights. *Ariz. Free Enter. Club's Freedom Club PAC v. Bennett*, 564 U.S. 721, 131 S. Ct. 2806 (2011).

<sup>36</sup>Washington, D.C.'s program documents refer to the grant or lump sum payments as "base" payments," which are issued to participating candidates in contests with an opponent. These grant or "base" payments of public funds are issued in two parts: (1) when the candidate has met the financial threshold to qualify for the program, and (2) when the candidate qualifies to have their name placed on the ballot

<sup>37</sup>Montgomery Cty., Md. Code, § 16-31.

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The committee reported that it met with representatives from nonprofit organizations that studied public campaign financing programs nationwide to solicit their observations about these programs and any lessons learned about how to determine funding needs. Committee members reported that they considered New York City's matching funds program a useful model due to its similarities to Montgomery County's program structure. However, program officials also noted some differences, such as New York City's program having more staffing resources than Montgomery County. The officials said they were not aware of any other county-level programs in existence at the time their program was created, and that this posed a challenge in seeking ideas from other programs.

Much as programs within our review have been influenced by existing public campaign financing programs nationwide, they have also influenced newer programs. For example, voters in Oakland, California passed a ballot measure in 2022 to establish a voucher-based program and, according to a City of Oakland memorandum on the program, the city's program is modelled after Seattle's voucher program.<sup>38</sup> Another memorandum reports that program staff met with Seattle officials to learn about their procedure for processing vouchers.<sup>39</sup> Similarly, according to Maryland state officials, other Maryland counties that adopted public campaign financing programs used Montgomery County's structure as a model for their own programs, making only small changes such as slightly different matching rates.

## Lessons Learned during Implementation

Officials we interviewed from six of the nine public financing programs told us that aspects of their program structure changed as a result of lessons learned during program implementation. Generally, these changes came in response to candidate feedback or observations from program officials regarding potential inefficiencies or improvements.

Program officials in Montgomery County provided an example of a lesson learned. In Montgomery County, a participating candidate may not accept more than \$250 in contributions from a given individual during an election

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<sup>38</sup>City of Oakland, *Measure W Implementation Update and Consideration of the Postponement of the Distribution and Use of Democracy Dollars Vouchers for the 2024 Election*. Staff Memorandum to Public Ethics Commission (June 30, 2023).

<sup>39</sup>City of Oakland, *Measure W Oakland Fair Elections Act Implementation Update for the August 9, 2023, Regular PEC Meeting*. Staff memorandum to Public Ethics Commission (July 28, 2023)

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cycle—except for personal contributions or loans from the candidate or their spouse. When the program was first implemented, this exception allowed a candidate and their spouse to each loan \$6,000 to the candidate’s campaign. according to program officials, one candidate noted that this unfairly benefited married candidates because their household could loan the campaign twice as much as an unmarried candidate’s household. Subsequently, the county council amended the law to allow a candidate, their spouse, or a candidate and spouse collectively, to loan the campaign up to \$12,000 in total. This new law provides unmarried and married candidates the same opportunity to receive up to \$12,000 for their campaigns via this exception to the cap on individual contributions.

Program officials in Seattle told us about a lesson they learned related to the distribution of vouchers. Officials told us that they initially distributed vouchers to the public on January 1 of an election year. However, they observed that many residents were discarding their vouchers because they received them too far in advance of the election. They also reported receiving feedback from voters and candidates that January 1 was too early to receive the vouchers. As a result, Seattle’s program issued vouchers in February during the 2019 election and subsequent elections.

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## Program Requirements and Candidate Needs and Views May Influence Participation

Program officials we interviewed said that when deciding whether to participate in a public campaign financing program, candidates are influenced by program requirements, their own funding needs, and views about public financing, among other things.

### Program Requirements

Program officials told us that program requirements can influence candidates’ decisions to participate in a public campaign financing program. Program officials we interviewed from seven of the nine locations said a key reason candidates may decide not to participate in a public campaign financing program is because of requirements such as restrictions around spending and fundraising. For example, these requirements may restrict how much money a candidate can raise and spend overall, how much money they can accept from individual donors, and how much money they can personally donate to their campaign. Program officials from Minnesota and Los Angeles said that independently wealthy candidates who wish to self-fund their campaigns may choose not to participate in the programs due to such requirements. Similarly, program officials from Montgomery County said some candidates prefer to fund their campaigns with large donations which would not be allowed under the program’s requirements. The officials said

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that, for some candidates, requesting large donations from a few donors can be easier than attempting to raise the same amount of funding by requesting small donations. Program officials from Hawaii said their public campaign financing program provides relatively limited funding, which may affect whether candidates participate.

Program officials we interviewed also said that in some cases candidates sought to participate in the program but were unable to meet the qualifying requirements. For example, program officials in Albuquerque and Hawaii said that many candidates attempt to qualify for the public funding programs, but find it challenging to obtain the minimum number of contributions from voters to qualify. Program officials in Washington, D.C., also stated that a key reason candidates may not qualify to participate in the city's program is because they have unpaid fines or penalties owed for a violation of the Fair Elections Act, which are disqualifying.<sup>40</sup>

While certain requirements may affect whether candidates participate in public campaign financing programs, officials also provided context as to why these requirements exist. For example, program officials in Los Angeles stated that candidates must qualify for the ballot to participate in the program. The officials said the ballot is not finalized by the City's elections division until four or five months before the election. Officials noted that candidates therefore will not know if they qualify for public funds until relatively close to the election. This can create uncertainty for the candidates regarding decisions about raising and spending money early in their campaigns. However, officials said the purpose of the requirement is to ensure that city funds only go to candidates who are genuinely able to run for office and to assure city residents that public funds are being properly safeguarded.

## Candidate Funding Needs

Program officials told us that another key factor affecting program participation is how much funding candidates perceive their campaign will require, and whether the public financing program would provide that level of funding or whether they would need to rely on private fundraising. A candidate's decision may depend upon the amount of funding the program provides, the candidate's perception of their own fundraising ability, the competitiveness of a specific contest, and the resources of the candidate's opponents.

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<sup>40</sup>See 3 D.C.M.R. § 4206.2(b)(5).



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Program officials from all nine of the locations we interviewed stated that many candidates are attracted to the public campaign financing program because it provides an accessible source of funding for their campaign. This can be particularly appealing for candidates who may have limited fundraising experience, such as grassroots and first-time candidates. For example, program officials in Montgomery County stated that participating in the public campaign financing program allows candidates who may not have widespread name recognition to compete with candidates who are more well known.

However, program officials from eight of the nine locations stated that candidates may perceive public funding to be insufficient to run a competitive campaign. For example, program officials from Albuquerque said a key reason candidates may not participate in the city's public campaign financing program is if they are concerned that participating will prevent them from being competitive against a well-funded opponent. Similarly, program officials from Maine told us that gubernatorial candidates are much less likely to participate than other candidates (such as legislative candidates) because a statewide gubernatorial race typically involves higher spending than these other races.

#### Views about Public Financing

According to some program officials, candidate participation in a public campaign financing program can be influenced by the candidate's views about public financing, and their perceptions of the public's views about these programs. For example, program officials from Maine and Minnesota said that some candidates may choose not to participate because they believe public funds should not be used to support campaigns. On the other hand, program officials in Arizona, Montgomery County, and Washington, D.C. said that some candidates choose to participate in public campaign financing programs due to their perception of positive public opinions on public campaign financing.

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#### Perspectives on Program Effects Varied

Program officials shared perspectives on the effects they believe their programs have had, such as new candidates running for office, increased voter engagement, and other effects.

**New candidates running for office.** Officials from seven of the nine programs we interviewed said they believed their program encouraged new candidates to run for office. For example, officials from five programs said their programs may have contributed to some first-time candidates who lacked fundraising experience deciding to run for office. Program officials in Montgomery County and Maine said the presence of new candidates contributes to a more diverse candidate pool overall.

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There are several benefits to encouraging more candidates to run for office, according to program officials we interviewed. For example, program officials from Los Angeles said that a larger candidate pool results in more choices for voters and that new candidates can introduce new ideas into the public discourse. However, program officials from Montgomery County, Seattle, and Los Angeles said that it can be challenging to attribute observed trends to the program itself, rather than to external factors that they had observed, including recent increases in grassroots campaigns nationwide.

Findings from the studies we reviewed showed mixed results regarding the effect of public campaign financing programs on the number of candidates running. One nationwide study we reviewed analyzed data on all candidates running for state legislature across all U.S. states between 1976 and 2018, finding that public campaign financing increases the number of candidates running.<sup>41</sup> On the other hand, a study we reviewed on New York City's public campaign financing program using data from 1981 through 2009 did not find evidence that the program led to an increase in the number of candidates running for office.<sup>42</sup>

**Increased voter engagement.** Officials from seven of the nine programs said they thought their program had increased voter engagement or trust in the political process. One way in which officials said the program in their location has contributed to increased voter engagement is by incentivizing candidates to engage more with voters, such as by matching small donations or requiring candidates to obtain numerous small donations to qualify for the program.

For example, program officials in Los Angeles said that the program's structure incentivized more communication between candidates and potential constituencies because candidates must gather small qualifying contributions from city residents. The officials said that when an individual makes a small contribution to a campaign, it may help create a feeling of investment, and the individual may consider becoming more engaged in local politics as a result. A study we reviewed of Seattle's program in the 2017 election found that Seattle residents who used their vouchers were

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<sup>41</sup>Abigail Mancinelli, "Does Public Financing Motivate Electoral Challenges?" *State Politics & Policy Quarterly*, vol. 22, no. 4 (2022) [438-462], <https://doi.org/10.1017/spq.2022.12>.

<sup>42</sup>Jeffrey Kraus, "Campaign Finance Reform Reconsidered: New York City's Public Finance Program at Twenty." *Public Financing in American Elections*, edited by Costas Panagopoulos, 147-175. Philadelphia, PA: Temple University Press, 2011.

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more likely to vote in the election than those who did not use their vouchers, even after accounting for previous political engagement.<sup>43</sup>

**Other perspectives on program effects.** Program officials shared varied perspectives on other effects they believed their programs have had, such as reducing the influence of large donors and enabling participating candidates to win their contests. For example, officials in four of the nine programs stated that they thought their programs had reduced the influence of special interest money or large donors. However, officials from three other programs said that they did not think it was feasible for their programs to reduce the influence of special interests or large donors, since the programs can not restrict the fundraising of non-participating candidates. As another example, officials from four of the nine programs said that they thought their programs enabled participating candidates to win their contests. However, officials from another program said that increased contest wins are not necessarily attributable to the program because there may be numerous reasons unrelated to the program that may explain why voters prefer one candidate over another, such as voters preferring one candidate's platform over another's.

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## Third-Party Comments

We provided a draft of this report to campaign finance and election officials in the nine locations we contacted. We incorporated the technical comments from them as appropriate.

We are sending copies of this report to the appropriate congressional committees and members, campaign finance and election offices in the nine locations that participated in our research, and other interested parties. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

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<sup>43</sup>Jennifer Heerwig and Brian J. McCabe, "Expanding Participation in Municipal Elections: Assessing the Impact of Seattle's Democracy Voucher Program." University of Washington Center for Studies in Demography & Ecology, 2018.

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If you and your staff have any questions concerning this report, please contact me at (202) 512-8777, or [gablerr@gao.gov](mailto:gablerr@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff members who made key contributions to this report are listed in appendix III.

A handwritten signature in black ink that reads "Rebecca Gambler". The signature is written in a cursive, flowing style.

Rebecca Gambler  
Director, Homeland Security and Justice

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# Appendix I: Objectives, Scope, and Methodology

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This report addresses (1) key characteristics of public campaign financing programs implemented in selected states and localities; (2) available data on the use of these programs by candidates; and (3) factors affecting program structure and candidate participation in public campaign financing programs, and perspectives on the effects of these programs.

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## Overview

To obtain background information, identify changes in campaign financing programs since our 2010 report, and address our objectives, we conducted a search of literature published since 2010 to identify relevant reports, studies, and articles on the public financing of campaigns.<sup>1</sup> Specifically, a GAO research librarian conducted a literature search of research databases using search terms such as public financing of campaigns, public campaign finance, matching fund election programs, and campaign spending. We identified 25 sources that were relevant to our work and reviewed these sources to identify key findings. We also used this literature review, among other sources, to identify the four nongovernmental organizations with expertise in campaign finance reform or issues related to state and local public campaign finance programs that we interviewed.<sup>2</sup>

To address all three of our objectives, we selected five states and localities with public campaign financing programs to serve as nongeneralizable case studies. These locations were Arizona; Minnesota; Los Angeles, California; Montgomery County, Maryland; and Seattle, Washington. To select these locations, we identified programs that covered both executive and legislative offices at the state and local level, and programs that had been implemented for at least two election cycles at the time of our analysis.<sup>3</sup> We also selected locations to represent a mix of program models (grant programs, matching fund programs, and voucher programs) and population size. In addition, we considered candidate participation using publicly available sources, such as program statistics or annual reports available on a jurisdiction's website.

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<sup>1</sup>GAO, *Campaign Finance Reform: Experiences of Two States That Offered Full Public Funding for Political Candidates*, [GAO-10-390](#) (Washington, D.C.: May 28, 2010).

<sup>2</sup>These organizations were the Brennan Center for Justice, the Campaign Legal Center, Common Cause – California, and the National Conference of State Legislatures.

<sup>3</sup>Executive offices include governor, mayor, or county executive. Legislative offices include state legislator or city or county councilmember.

To address our first objective, we reviewed program documentation and interviewed program officials to describe the key characteristics of the selected programs in the five locations. We also reviewed relevant state and local statutes and administrative codes governing each public financing program and other documentation related to the program, such as candidate handbooks, annual reports, and information on the program's website.

To address our second objective, we obtained and analyzed, to the extent possible, available data on candidate program participation, election outcomes, and reported campaign finance data for the two most recent election cycles for which data were available, for each case study location. Our methodology for obtaining and analyzing these data is described in detail in the next section of this appendix.

To address our third objective, we selected four other locations with public campaign financing programs, using the same selection methodology described above. These four locations were Hawaii, Maine, Washington, D.C., and the city of Albuquerque, New Mexico. For each of the five case study locations and the four additional locations, we reviewed program documentation and interviewed program officials to obtain their perspectives on program structure, candidate participation, and program effects. We also identified further perspectives on public campaign financing programs, including any discussions of the ways in which program effects might be assessed, during our review of the 26 reports and studies obtained from our literature search.

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## Analyses of Data on the Use of Public Campaign Financing Programs by Candidates

To address our second objective regarding what existing data indicate about the use of public campaign financing programs by candidates, we obtained and analyzed, to the extent possible, available data from each case study location on candidate program participation, characteristics of participating and non-participating candidates, election outcomes, and campaign finance information for each of the two most recent election cycles for which data were available.

We defined an election cycle to include both the primary and general election in a given election year, but excluded any special elections or runoff elections that may have taken place during that year. Where possible, we analyzed data separately for the primary and general

election in each election cycle.<sup>4</sup> For each location we requested data from program officials or obtained such data from publicly available sources on all contests in these elections for which candidates were eligible to participate in the public campaign financing program.<sup>5</sup> We analyzed the data to determine the following types of information for each of the five locations we reviewed:

Program Participation and Candidate Characteristics

- Candidate participation in the public campaign financing program, by election and type of office sought (e.g. executive or legislative offices);<sup>6</sup>
- Candidate program participation, by incumbent and nonincumbent candidates, by election;<sup>7</sup>
- Program participation by first-time candidates and those who had previously run for office, by election;<sup>8</sup>
- Percentage of contests in which at least one candidate participated in the program, by election;

Election Outcomes

- Percentage of contests where participating candidates won the primary or advanced to the general election, or won the general election, by election;

Campaign Finance Information

- Public financing dollar amounts issued to all participating candidates, and to each individual candidate, by election or election cycle;
- Private contributions reported by candidates (including the number of contributions and the dollar amount); and

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<sup>4</sup>We did not analyze information on primary elections in Minnesota because Minnesota's public campaign financing program is only available to candidates in the general election.

<sup>5</sup>We define each contest as the election race for a specific seat or district within each office sought. For example, city council district 5 in Los Angeles is one contest for the office of city council.

<sup>6</sup>We defined a participating candidate as one who was listed on the ballot, accepted into the public campaign finance program, and who received at least \$1 in public funds. We defined executive candidates as those running for the offices of governor in Arizona and Minnesota, mayor in Los Angeles and Seattle, and county executive in Montgomery County. We defined legislative candidates as those running for the offices of state senate and state house of representatives in Arizona and Minnesota, city council member in Los Angeles and Seattle, and county council member in Montgomery County.

<sup>7</sup>We defined incumbency as specific to the office sought by the candidate.

<sup>8</sup>We defined a first-time candidate as a candidate who had not previously run for election to that office. We defined a candidate who had previously run for election as having run for the specific office in question. First-time candidate information was not available in Arizona or Montgomery County, Maryland.

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Arizona

- Expenditures reported by candidates.

We obtained data on Arizona’s public campaign financing grant program for the 2020 and 2022 primary and general elections. We obtained data on candidate program participation from a public portal maintained by the Arizona Secretary of State’s Office.<sup>9</sup> This data portal is a public record of candidates’ required campaign finance reporting to the state, including any public funds received by their campaigns. We identified candidates who participated in the program by identifying any candidate who reported receiving public funding during the election cycle from Arizona’s Citizens Clean Elections Commission, which administers the public campaign financing program.

Under Arizona program requirements, a participating candidate is one who participates during an entire election cycle. Therefore, any candidate who has received public funds during the election cycle is considered a participating candidate for all elections during that cycle (i.e., the primary and general elections, should they run in both). For the 2020 and 2022 election cycles, we examined any contests for offices that were eligible for public financing. In 2020, those offices were state legislator, and corporation commissioner. In 2022, those offices were governor, state legislator, attorney general, corporation commissioner, secretary of state, state mine inspector, state treasurer, and superintendent of public instruction.

We obtained data on which candidates were on the ballot for each contest, and the outcomes of those contests, from the official election canvasses reported by the Arizona Secretary of State on its election information website.<sup>10</sup> We determined whether a candidate was an incumbent based on whether that candidate had won the general election contest for that office in the prior election. We also analyzed data on outcomes for the 2018 general election solely for the purposes of determining incumbency in the 2020 elections for offices with two-year terms (i.e., state legislative positions) and for determining incumbency in

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<sup>9</sup>Arizona Secretary of State, See *The Money Election Funds Portal*, Database, accessed: June 20, 2024, <https://seethemoney.az.gov>.

<sup>10</sup>“Current and Historical Election Information,” Elections Division, Arizona Office of the Secretary of State, accessed June 20, 2024, <https://azsos.gov/elections/results-data/election-information>.



the 2022 election for offices with four-year terms (i.e., governor, secretary of state, attorney general, state treasurer, superintendent of public instruction, state mine inspector).

We also analyzed data on outcomes for the 2016 and 2018 general elections for the purposes of determining incumbency for the corporation commission elections held in 2020 and 2022, as those positions serve four-year terms and approximately half the commission's seats are elected on alternate years. The election results did not include information on whether candidates were running for a particular office for the first time.

We also obtained data on public grant funding received, and campaign contributions and spending from the Arizona Secretary of State's data portal. The database includes transaction-level data on candidate contributions received and expenditures made for a given candidate, and we used it to create candidate-level summaries for our analyses. The structure of the database did not allow us to differentiate whether a contribution or expenditure was associated with the primary or general election in each election cycle. Therefore, we analyzed financial data for Arizona candidates at the election cycle level, rather than for the primary and general election within a given cycle. Of the 404 candidates we analyzed across both election cycles, nine had no or incomplete reported financial data in the portal. We excluded these nine candidates when analyzing information related to financial reporting, such as average total campaign expenditures, but included them in our analyses of candidate program participation, candidate characteristics, and election outcomes.

## Minnesota

Officials from Minnesota's Campaign Finance and Public Disclosure Board provided data files for the 2020 and 2022 general elections extracted from a campaign finance database maintained by the board. We obtained data on all contests eligible for public campaign financing, including state legislator in 2020, and governor, attorney general, secretary of state, state auditor, and state legislator in 2022. In Minnesota's public campaign financing grant program, candidates are only eligible to participate if they have qualified to appear on the ballot and have advanced from the primary election to the general election. Therefore, we only obtained and analyzed data for Minnesota's general election in the selected election years.

To determine candidate participation in the public campaign financing program including the amount of public funds each candidate received, we used data files provided by officials that contained each participating

candidate's name, and office sought for the 2020 and 2022 election years. In addition, to determine the total number of candidates, election outcomes, and characteristics of candidates, we used data files provided by officials that included all candidates on the general election ballot, their office sought, if they won their general election, and if they were an incumbent or first-time candidate for these election years.

For campaign finance information for the 2020 and 2022 election years, Minnesota officials provided data files we used to determine the number and amount of campaign contributions, public funds received, and expenditures, by candidate and office type. Specifically, we used data files that contained transaction-level data on campaign contributions by candidate, and candidate-level data on contributions by type of contributor (individuals, political committees, etc.), total public funds received, and total expenditures for each election year.

Of the 822 unique candidates we analyzed across both election years, 52 had no reported financial data in the portal. We excluded these 52 candidates when analyzing information related to financial reporting, such as average total campaign expenditures, but included them in analyses of candidate program participation and election outcomes.

## Los Angeles, California

We obtained and analyzed data on Los Angeles' matching funds program for the 2020 and 2022 primary and general elections from the Los Angeles City Ethics Commission officials responsible for administering the public campaign finance program. The campaign finance data originated from required campaign filings submitted to the Ethics Commission, which can also be found in the Ethics Commission's public data hub. Program officials provided data on all candidates in contests eligible for matching funds, which included contests for city council in 2020, and for mayor, city attorney, city controller, and city council in 2022.<sup>11</sup>

These data included whether the candidate participated in the matching funds program, was an incumbent, and was running for the specific office for the first time. Program officials also provided information on whether the candidate won or advanced from the primary election, and the outcome of the general election. Additionally, officials provided campaign

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<sup>11</sup>We combined data on contests for city attorney and controller into one category which we labeled as "other" contests.

finance data for all participating and non-participating candidates at the candidate level rather than the individual transaction level. For example, they provided the total dollar amount of matching funds received by each participating candidate, and the total number and amount of contributions received and the total amount of expenditures made by each participating and non-participating candidate. Program officials also provided information on total public funds disbursed for each candidate by election.

Montgomery County, Maryland

We obtained and analyzed data from several sources for Montgomery County's public campaign finance matching funds program for the two most recent primary and general elections (2018 and 2022).

Public campaign financing program officials from the Montgomery County Department of Finance provided candidate-level data on candidates participating in the program during these two election years for the offices that are eligible for public matching funds: county executive, county council-at-large, and county council-district. Specifically, for each participating candidate, the candidate-level data file included office sought and the public financing amounts (matching funds) issued to each participating candidate.

Montgomery County Department of Finance officials did not have information on various data elements relevant to our analyses for candidates who did not participate in the public campaign financing program. To obtain election outcome information for all candidates in contests eligible for public matching funds, including those who did not participate in Montgomery County's public campaign financing program, we extracted information from Maryland's Board of Elections website.<sup>12</sup>

Specifically, from this website we obtained information about which candidates appeared on the ballot for eligible contests, whether they won the primary election or advanced to the general election, and outcomes from the general election. This data source did not include information on whether candidates were first-time candidates. We also used this data source to determine whether a candidate was an incumbent based on whether that candidate had won the general election for that office in the prior election. Specifically, to determine incumbency in the 2018 election, we used election outcome data for the 2014 general election, and to

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<sup>12</sup>"Elections by Year," The State Board of Elections, Maryland, accessed March 18, 2024, <https://elections.maryland.gov/elections/>.

determine incumbency in the 2022 election we used election outcome data for the 2018 general election.

We merged the Montgomery County public campaign financing program participation data with the State of Maryland election outcome data for each primary and general election in 2018 and 2022. We analyzed the merged dataset to determine candidate program participation by office sought, contest and election, whether the candidate won their contest, and whether the candidate was an incumbent.

For data on the number and amount of contributions and expenditures, by candidate, we extracted information from the Maryland Campaign Reporting Information System.<sup>13</sup> We undertook a multi-step process to extract and assemble individual transaction data from this source for the purposes of our analysis based on interviews with Maryland State Board of Elections officials, and subsequently confirmed the steps we took to extract the data for our analysis with these officials. We obtained information on contributions and expenditures filed by candidates in the 2018 and 2022 elections using a candidate's committee name in the reporting system.

## Seattle, Washington

We obtained candidate-level data on Seattle's voucher program for the 2019 and 2021 election cycles prepared for us by the Seattle Ethics and Elections Commission officials responsible for administering the program. We obtained data on all contests eligible for vouchers, which included contests for city council in 2019; and for mayor, city attorney, and city council in 2021. Program officials provided data on candidate office sought, program participation, candidate characteristics (including incumbency and whether the candidate was running for that office for the first time), and election outcomes in the primary and general elections.

Program officials also provided candidate-level campaign finance information for each candidate, including the number and dollar amount of vouchers received, the number and dollar amount of contributions received from non-public sources, and the dollar amount of campaign expenditures. The officials provided campaign finance data at the candidate level for the entire election cycle, without distinguishing between funds received or spent during the primary and general election.

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<sup>13</sup>"Campaign Finance Information," Maryland Campaign Reporting Information System, accessed: March 11, 2024, <https://campaignfinance.maryland.gov/>.

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In addition, officials provided information on the total public funds disbursed for each candidate by election cycle.

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## Data Reliability

In addition to the steps described above for each case study location, we assessed the reliability of each data source by performing electronic testing for obvious errors in accuracy and completeness, and reviewing associated documentation, such as system flow charts. We also interviewed the relevant state and local officials responsible for each of the data systems about the structure of each system, and any concerns relevant to the data fields we planned to use in our analyses. When we found discrepancies, such as nonpopulated fields, we worked with relevant officials to address the discrepancies before conducting our analyses. Based on these steps, we determined that the data from the five case study locations were sufficiently reliable for the purposes of describing candidate participation in public campaign financing programs, and the level of public funding, private contributions, and spending by candidates in contests in the study years specific to each location.

We conducted this performance audit from February 2023 to December 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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# Appendix II: Case Study Profiles

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States and localities that have implemented public campaign financing programs have generally used three different models: grants, matching funds, or vouchers. We selected public campaign financing programs in five locations—two states and three localities—that have implemented programs using these models to serve as nongeneralizable case studies. These locations are Arizona; Minnesota; the city of Los Angeles, California; Montgomery County, Maryland; and the city of Seattle, Washington. Detailed information on each program is included in the remainder of this appendix.

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## Grant Programs

The jurisdiction provides qualifying candidates with lump-sum grants of public funds to finance their campaigns. The grant amount can be either for the full or partial cost of a campaign, depending on the program. In full grant systems, also called “clean elections” programs, participating candidates may only make campaign expenditures with public funds and may not raise private contributions after receipt of the grant.

- Arizona: Provides candidates with a grant for the full cost of a campaign.
- Minnesota: Provides candidates with a grant for the partial cost of a campaign.

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## Matching Funds Programs

The jurisdiction matches certain private contributions received by participating candidates with public funds at a set rate. Depending on the jurisdiction, private contributions are matched either dollar for dollar or at some multiple of public-to-private dollars. Generally, these programs limit the size of contributions that are eligible for public matching (e.g., \$250 or less) and will not match contributions from certain sources (e.g., government contractors).

- Los Angeles, California: Matches \$6 in public funds for every dollar a participating candidate receives, up to certain limits.
- Montgomery County, Maryland: Matches between \$2 and \$6 in public funds for every dollar a participating candidate receives, up to certain limits.

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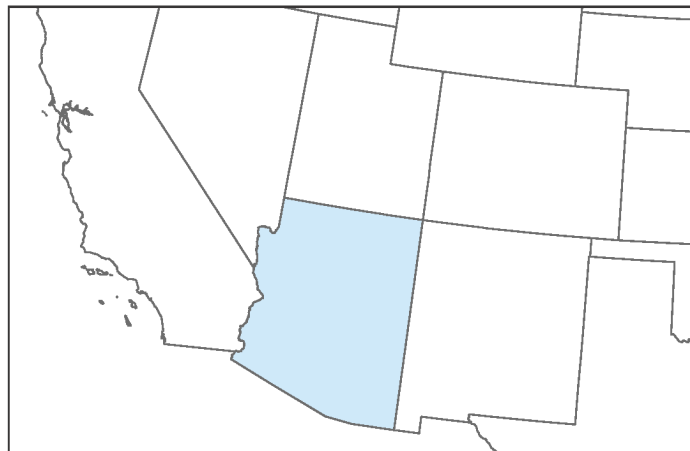
## Voucher Programs

The jurisdiction provides eligible residents with a credit of public funds (i.e., “vouchers”) to assign to one or more participating candidates of their choosing. For example, all eligible jurisdiction residents may receive four \$25 vouchers, worth \$100 in total, each election year. Residents may then assign their vouchers to more than one candidate or to the same candidate. Once residents have assigned vouchers, the candidates can redeem them with the jurisdiction for public funds to use in their campaigns.

- Seattle, Washington: Issues eligible residents 4 vouchers worth \$25 each that may be assigned to candidates of their choosing.

# Arizona

## Public Campaign Financing Program: Grant Model



Source: U.S. Census Bureau. | GAO-25-106650

### HISTORY

Arizona's public campaign financing program was created in 1998 by ballot initiative.<sup>a</sup> The stated intent of this initiative was to diminish the influence of special interest money and encourage citizen participation in the political process, among other things. The program went into effect for the 2000 election.

The program has undergone several changes since its adoption. For example, the program initially provided

additional matching funds to participating candidates facing non-participating opponents whose contributions, in combination with certain independent expenditures, exceeded the allotment of state funds for the participating candidate. However, this provision was declared unconstitutional by the Supreme Court and subsequently removed from the program.<sup>b</sup> Arizona legislation has also prohibited the program from spending money to promote its benefits.<sup>c</sup>

<sup>a</sup>For more information about Arizona's public campaign financing program, see A.R.S. §§ 16-940–16-961.

<sup>b</sup>In *Arizona Free Enterprise Club v. Bennett*, the Supreme Court held that this triggered match provision of Arizona's public financing program impermissibly forced privately funded candidates and independent political organizations to restrain their spending, which infringed on their First Amendment rights. *Ariz. Free Enter. Club's Freedom Club PAC v. Bennett*, 564 U.S. 721, 131 S. Ct. 2806 (2011).

<sup>c</sup>2002 Ariz. Sess. Law, ch. 212, § 1 (codified as amended at Ariz. Rev. Stat. § 16-949(D)).

### STRUCTURE

The program is managed by the Arizona Citizens Clean Elections Commission, which also enforces state campaign finance rules for all candidates. This nonpartisan commission has five members and a professional staff.

The program is funded by a 10 percent surcharge on all civil penalties and criminal fines, civil penalties for violations of limits on spending and contributions or campaign finance reporting requirements, and \$5 qualifying contributions collected from participating candidates. According to program officials, the program's trust fund had about \$28 million in funding as of November 2023.

### PROGRAM REQUIREMENTS

Candidates running for governor, secretary of state, attorney general, treasurer, superintendent of public instruction, corporation commissioner, mine inspector, state senator, and state representative are eligible to participate in the public financing program. To qualify for public funds, candidates must:

- File an application for certification as a participating candidate.
- Abide by contribution limits.
- Attend at least one commission-sponsored candidate training class.
- File the paperwork required to appear on the ballot.
- Collect a minimum number of qualifying contributions of \$5 each which must be reported to the secretary of state's campaign finance reporting system. These qualifying contributions are to be submitted to the secretary of state's office. The qualifying contributions must be accompanied by forms with each contributor's name, address, and signature.
- Adhere to spending limits.
- Attend commission-sponsored debates held in both the primary and general election periods.



**Qualifying contributions and contribution limits required for participation in Arizona's public campaign financing program in the 2022 election**

Office sought	Number of qualifying contributions required <sup>a</sup>	Early contribution limit <sup>b</sup>	Individual contribution limit <sup>c</sup>	Personal contribution limit <sup>d</sup>
<i>Governor</i>	4,000	\$63,450	\$180	\$1,580
<i>Secretary of state, attorney general</i>	2,500	\$55,361	\$180	\$1,580
<i>Corporation commissioner, superintendent of public instruction, treasurer</i>	1,500	\$27,675	\$180	\$1,580
<i>Mine inspector</i>	500	\$13,842	\$180	\$1,580
<i>State senator, state representative</i>	200	\$4,323	\$180	\$800

Source: Arizona public campaign financing program law and documentation. | GAO-25-106650

<sup>a</sup> Qualifying contributions are contributions of \$5 that candidates must collect from voters in their district (or statewide, if running for statewide office) in order to qualify for the public campaign financing program.

<sup>b</sup> Early contributions are contributions that candidates are permitted to raise and spend during the period beginning the day after a general election and ending one week before the primary election. Early contributions serve as a form of seed money for their campaign.

<sup>c</sup> To participate in the program, a candidate may not accept early contributions exceeding \$180 from any one individual, not including the candidate themselves. Contributions from political action committees, businesses, corporations, political parties, and labor unions are prohibited.

<sup>d</sup> Personal contributions are funds contributed by the candidate to their own campaign. The personal contribution limit includes contributions received from certain family members and may only be spent up until one week before the primary election.

**AVAILABLE PUBLIC FUNDING**

Candidates who meet program requirements can apply for public funds. The Secretary of State's office verifies a random sample of the candidate's qualifying contributions to determine whether to approve the candidate for funding. The commission provides the candidates with funding prior to the primary election and general election, respectively. Unopposed candidates receive funding equal to five dollars times the number of qualified contributions for that candidate.

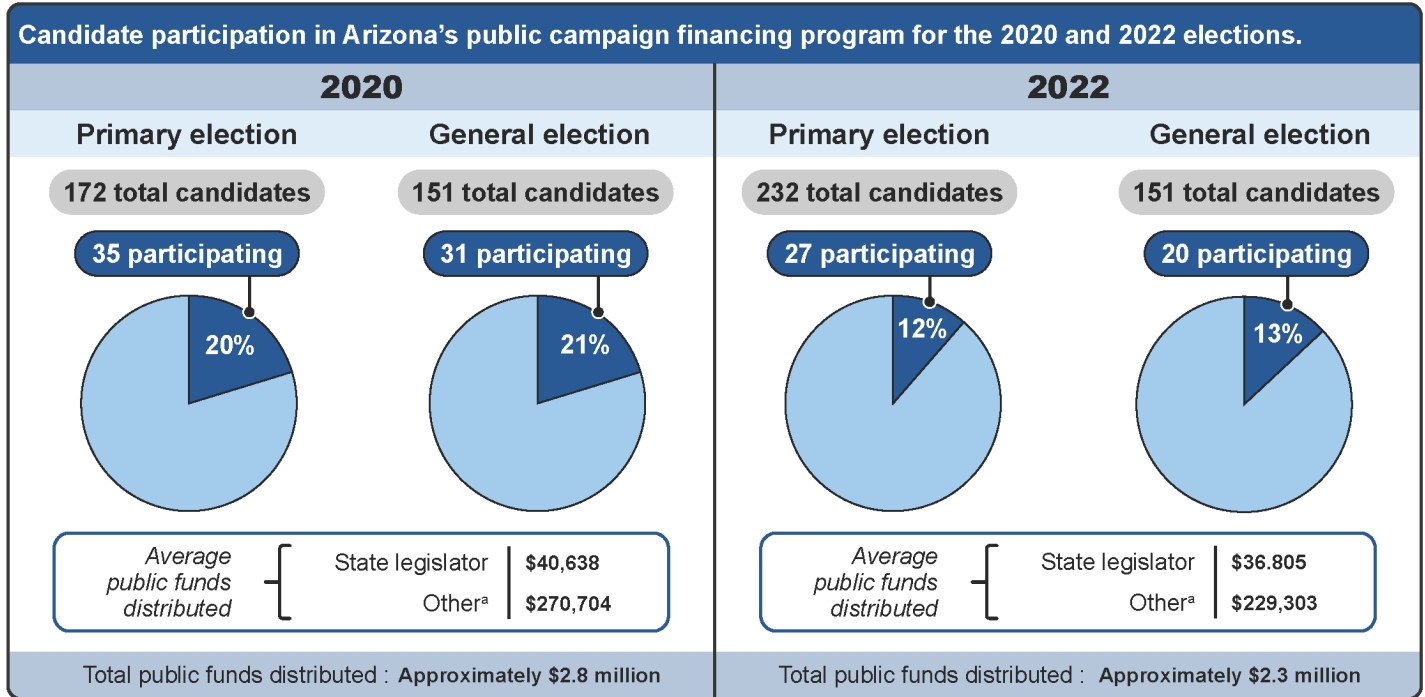
**Public funding available to each candidate participating in Arizona's public campaign financing program in the 2022 election**

Office sought	Election funding for party-affiliated candidates <sup>a</sup>		Election funding for independent candidates <sup>b</sup>
	Primary	General	
<i>Governor</i>	\$854,567	\$1,281,851	\$1,495,493
<i>Secretary of state, attorney general</i>	\$221,442	\$332,163	\$387,524
<i>Corporation commissioner, superintendent of public instruction, treasurer</i>	\$110,698	\$166,047	\$193,722
<i>Mine inspector</i>	\$55,367	\$83,051	\$96,893
<i>State senator, state representative</i>	\$17,293	\$25,940	\$30,263

Source: Arizona public campaign financing program law and documentation. | GAO-25-106650

<sup>a</sup> To participate in the program, candidates must either be independent candidates, or be running for the primary or general election of a party recognized on the ballot. Legislative candidates from the majority party in a one-party-dominant district can opt to reallocate a portion of funds from the general election period to the primary election period.

<sup>b</sup> Independent candidates receive 70 percent of the election's primary and general spending limits, as a single disbursement to be spent in both the primary and general election.



Source: GAO analysis of Arizona public campaign financing program and elections data. | GAO-25-106650

<sup>a</sup> In the 2020 election, this included the corporation commission and no other offices. In 2022, these offices included secretary of state, attorney general, treasurer, superintendent of public instruction, corporation commission, and mine inspector. There was no gubernatorial election in 2020, and no participating gubernatorial candidates in 2022.

# Minnesota

## Public Campaign Financing Program: Grant Model



Source: U.S. Census Bureau. | GAO-25-106650

### HISTORY

Minnesota's public campaign financing program was created through legislation in 1974.<sup>a</sup> According to program officials, the program was an effort to improve public confidence in government following the Watergate scandal and Vietnam War. The first public

subsidy payments were made to candidates in 1976.

According to program officials, the program has undergone several changes since its adoption, generally related to increasing funding for the program.

<sup>a</sup>For more information about Minnesota's public campaign financing program, see Minn. Stat. §§ 10A.30–10A.324.

### STRUCTURE

Minnesota's public campaign financing program consists of two components: (1) direct public subsidy payments made to the candidates; and (2) the political contribution refund program. The political contribution refund program provides a refund for eligible Minnesota voters (\$50 for individuals and \$100 for married couples in 2022) who contribute to a registered political party unit or to a candidate who has signed the public subsidy agreement. The political contribution refund program does not issue public funds to candidates.

Direct public subsidy payments are made from a state elections campaign account. The campaign account is funded through an appropriation from the state general fund and a state tax check-off in which taxpayers can designate that \$5 be paid from the state's general fund to the general campaign account or to the account of a political party within the campaign account. From 2010 through 2012, and again in 2016 the governor suspended the political contribution refund program, and the account did not receive an appropriation.

The public campaign financing program is administered by the Campaign Finance and Public Disclosure Board, including professional staff, with the support of the Minnesota Department of Revenue and Minnesota Department of Administration. The board is bipartisan and comprised of six members appointed by the governor for staggered four-year terms. The board's responsibilities include interacting with candidates and their campaigns to help ensure compliance with the requirements of the program, as well as investigating any alleged or potential violations of the requirements.

In the 2020 election, \$2,131,750 in public subsidy payments were issued to qualified candidates. In the 2022 election, \$2,348,803 in public subsidy payments were issued to qualified candidates.

### PROGRAM REQUIREMENTS

Candidates running for governor, attorney general, secretary of state, state auditor, and state senate or state house of representatives are eligible to participate in the public financing program and receive direct public subsidy payments. To qualify for direct public subsidy payments, candidates must meet the following requirements:

- The candidate must sign and file a public subsidy agreement with the board by the applicable deadline.
- The candidate must form and register a campaign committee.
- The candidate must raise a specified amount in monetary contributions from people eligible to vote in Minnesota by July of the election year. Only the first \$50 received from each contributor can be counted as a qualifying contribution in any one election cycle. The amount that must be raised varies by office as described below.<sup>b</sup>
- The candidate or the campaign committee treasurer must sign an affidavit stating that the contribution threshold described above has been met and file the affidavit by the statutory deadline.
- The candidate must file to run for office as the candidate of a political party recognized in Minnesota. Candidates not affiliated with a recognized political party are not eligible for public subsidy payments.
- The candidate must have an opponent in either the primary or general election.
- The candidate's campaign committee must file the required pre-primary report with the board.
- The candidate must win the primary.

<sup>b</sup>The candidate can count contributions received between January 1 of the previous year and the cutoff date before the primary election. If one person gives the candidate more than \$50 during the specified time period, the candidate can count only the first \$50 of that person's contribution toward the public subsidy requirement. The candidate must record the name and address of the contributor, regardless of the amount of the contribution, to count the contribution toward the required threshold.

**Contribution limits, qualifying contributions required for participation, and spending limits for participating candidates in Minnesota's public campaign financing program in the 2022 election**

Office sought	Personal contribution limit <sup>a</sup>	Total amount that must be raised in qualifying contributions	Base spending limit <sup>b</sup>
<i>Governor</i>	\$20,000	\$35,000	\$4,232,700
<i>Attorney general</i>	\$12,500	\$15,000	\$725,800
<i>Secretary of state</i>	\$10,000	\$6,000	\$483,900
<i>State auditor</i>	\$10,000	\$6,000	\$483,900
<i>State senate</i>	\$5,000	\$3,000	\$109,100
<i>State house of representatives</i>	\$5,000	\$1,500	\$72,700

Source: Minnesota public campaign financing program law and documentation. | GAO-25-106650

<sup>a</sup> According to Minnesota program documents, personal contributions are those a candidate makes to their own campaign committee.

<sup>b</sup> Candidates may be eligible for a 10 percent increase in their base campaign spending limit if they have not previously held the same office or run for that office and if they have not in the past 10 years raised or spent more than \$750 in a run for any other office whose territory includes more than one-third of the people able to vote for the new office. Candidates may also receive a 20 percent increase in their base campaign spending limit if they won a closely contested primary election. Candidates can receive both increases if they are a first-time candidate and won a closely contested primary.

**AVAILABLE PUBLIC FUNDING**

Candidates who meet program requirements can apply for public funds. The public subsidy payment amounts are determined in the spring of an election year, when the Campaign Finance and Public Disclosure Board estimates payment amounts for candidates of each office type based on how much money the Department of Revenue collected from the tax check-off, by political party for each legislative district. The board publishes the estimated amounts before the filing period opens.

**Average public funding payments made to individual candidates participating in the Minnesota public campaign financing program by office for the 2022 election**

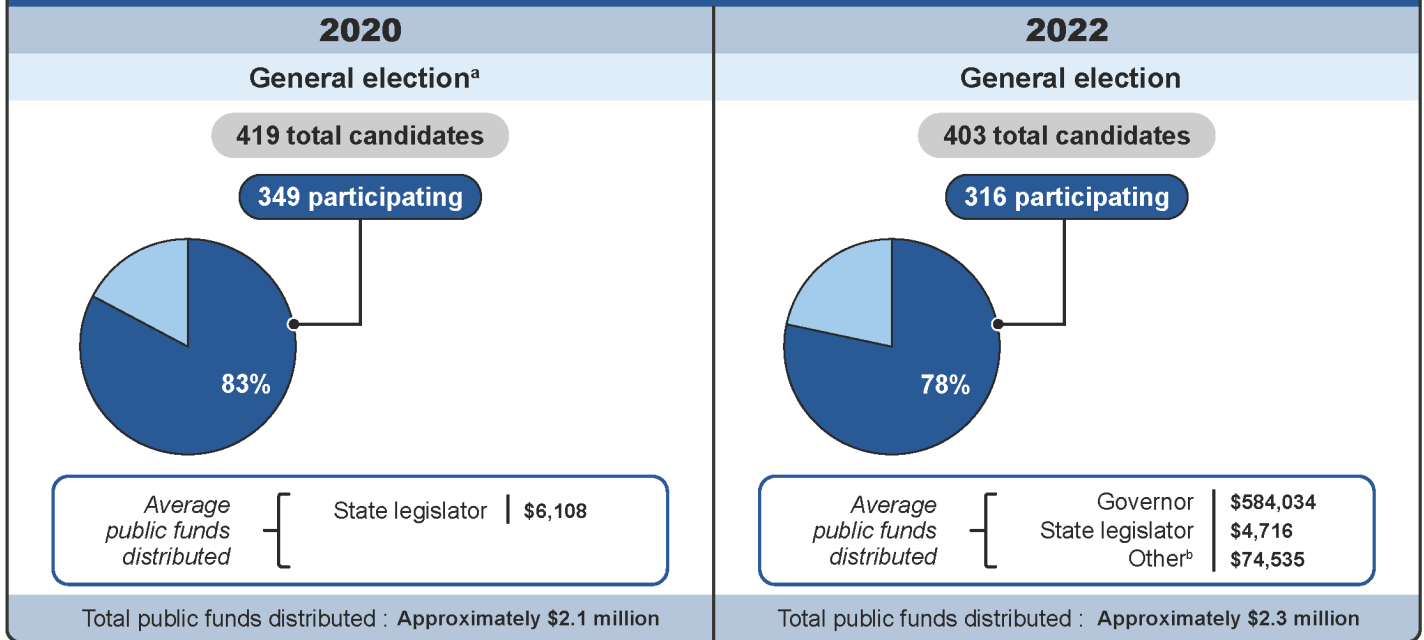
Office sought	Average public subsidy payment amounts made to individual candidates
<i>Governor<sup>a</sup></i>	\$584,034
<i>State senate</i>	\$7,021
<i>State house of representatives</i>	\$3,541
<i>Other<sup>b</sup></i>	\$74,535

Source: GAO analysis of Minnesota public campaign financing program and elections data. | GAO-25-106650

<sup>a</sup> There was only one candidate running for these offices who participated in the public campaign financing program for the 2022 election.

<sup>b</sup> These offices included attorney general, secretary of state, and state auditor.

Candidate participation in Minnesota's public campaign financing program for the 2020 and 2022 elections



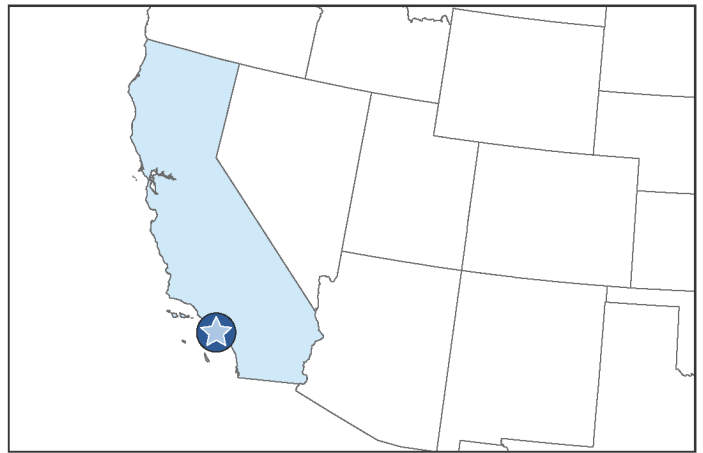
Source: GAO analysis of data provided by officials from the Minnesota Campaign Finance and Public Disclosure Board. | GAO-25-106650

<sup>a</sup>There were no contests for governor, attorney general, secretary of state or state auditor in 2020.

<sup>b</sup>These offices included attorney general, secretary of state, and state auditor.

# Los Angeles, CA

## Public Campaign Financing Program: Matching Funds Model



Source: U.S. Census Bureau. | GAO-25-106650

### HISTORY

The city of Los Angeles's public campaign financing program was created in 1990 by ballot initiative.<sup>a</sup> According to program officials, the ballot initiative included a package of campaign finance and ethics reforms motivated by an ethics scandal in city government. The public financing program went into effect for the 1993 election.

The program has undergone several changes since its adoption, including lowering the threshold total dollar amount of contributions candidates must collect to qualify for the program and increasing the maximum amount and rate of matching funds available to participating candidates.

<sup>a</sup>For more information about Los Angeles's public campaign financing program, see L.A.M.C. §§ 49.7.22–49.7.30; L.A.A.C. §§ 24.31–24.38.

### STRUCTURE

The program is managed by the city's Ethics Commission, which administers city and state laws related to campaign financing, contracts, developers, governmental ethics, and lobbying. The commission has a professional staff and is governed by a five-member board of commissioners.

The program receives an annual appropriation that is adjusted based on the consumer price index. In fiscal year 2023, the program received a \$4 million appropriation. Program funds are deposited into a trust.

#### Qualified contributions of \$5 or more required to participate in Los Angeles's public campaign financing program for the 2022 election

Office sought	Minimum cumulative threshold required	Maximum amount per contributor that counts towards that threshold
<b>City council</b>	<b>\$11,400</b>	<b>\$114</b>
<b>Controller</b>	<b>\$32,100</b>	<b>\$214</b>
<b>City attorney</b>	<b>\$32,100</b>	<b>\$214</b>
<b>Mayor</b>	<b>\$64,200</b>	<b>\$214</b>

Source: Los Angeles public campaign financing program law and documentation. | GAO-25-106650

### PROGRAM REQUIREMENTS

Candidates running for mayor, city council, city attorney, and controller are eligible to participate in the public financing program. To qualify for matching funds, candidates must:

- Collect qualified contributions of \$5 or more from at least 100 individuals who reside in the council district (for city council candidates) or the city (for citywide candidates).
- Collect a minimum aggregate dollar threshold of qualified contributions from individuals residing within the city. In 2022, these thresholds were \$11,400 for city council candidates, \$32,100 for city attorney and controller, and \$64,200 for mayor.
- Limit their campaign spending.
- Limit the amount they contribute or loan to their own campaigns to certain amounts. In the 2022 election, these limits were \$37,000 for city council candidates and \$148,100 for citywide candidates, such as mayor, city attorney, and controller.
- Qualify to appear on the ballot and be opposed by a candidate who is also qualified to appear on the ballot.
- Participate in a debate or conduct a town hall meeting, subject to certain criteria.
- Attend an Ethics Commission training session.
- File all required campaign statements.

**AVAILABLE PUBLIC FUNDING**

Candidates who meet program requirements receive \$6 in public funds for every matchable dollar of a contribution they receive, up to certain limits.<sup>a</sup> Candidates request matching funds by filing a claim that identifies the contributions they wish to have matched and includes supporting documentation for those contributions, such as copies of checks or credit card transactions. Ethics Commission staff review each claim and then send the claim to the city comptroller's office for processing and payment.

**Public funding maximums available to each participating candidate in the Los Angeles public campaign financing program for the 2022 election**

Office sought	Per contributor	Per candidate in primary election	Per candidate in general election
City council	\$684	\$161,000	\$201,000
Controller	\$1,284	\$428,000	\$482,000
City attorney	\$1,284	\$482,000	\$562,000
Mayor	\$1,284	\$1,071,000	\$1,284,000

**Campaign spending limits for candidates participating in Los Angeles' public campaign finance program for the 2022 election<sup>b</sup>**

Office sought	Primary election	General election
City council	\$571,000	\$476,000
Controller	\$1,332,000	\$1,000,000
City attorney	\$1,498,000	\$1,165,000
Mayor	\$3,329,000	\$2,662,000

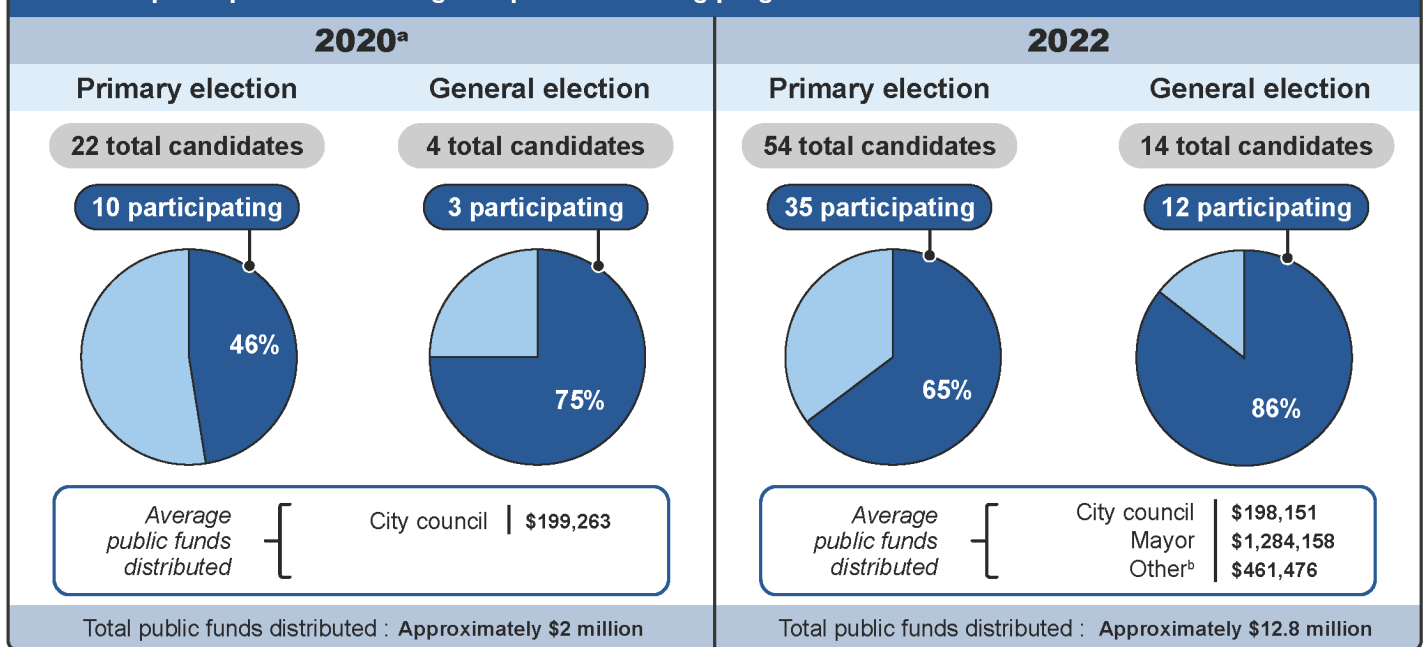
Source: Los Angeles, California public campaign financing program law and documentation. | GAO-25-106650

Source: Los Angeles, California public campaign financing program law and documentation. | GAO-25-106650

<sup>a</sup> Some types of contributions cannot be matched. Non-matchable contributions include those from the candidate or their immediate family, those from individuals who do not reside within the city, those from non-individuals (such as corporations or unions), those received before the candidate filed their declaration of intent to solicit or receive contributions; those received more than three months after the election, loans, pledges, non-monetary contributions, contributions unlawful under federal, state, or city law, and returned or unpaid contributions (e.g., bounced checks).

<sup>b</sup> The applicable spending limit is no longer binding on a participating candidate if a non-participating candidate in the same race makes or incurs campaign expenditures in excess of the expenditure ceiling, or independent expenditure communications in support of or opposition to any candidate in the same race exceed, in the aggregate, certain thresholds.

**Candidate participation in Los Angeles' public financing program for the 2020 and 2022 elections**



Source: GAO analysis of Los Angeles, California public campaign financing programs and elections data. | GAO-25-106650

<sup>a</sup> There were no contests for mayor, city attorney or city controller in 2020.

<sup>b</sup> These offices included city attorney and controller.



# Montgomery County, MD

## Public Campaign Financing Program: Matching Funds Model



Source: U.S. Census Bureau. | GAO-25-106650

### HISTORY

Montgomery County, Maryland's public campaign financing program was created in 2014 through legislation enacted by the county.<sup>a</sup> This legislation followed a 2013 Maryland state law that authorized counties to create public campaign financing programs and was the first of its kind in the state, according to county and state officials. The public financing

program went into effect for the 2018 election.

The program has undergone several changes since its creation, including increasing the contribution limit for individual contributors, allowing candidates to collect additional qualifying contributions if their application is denied, and requiring candidates to return unspent money in the candidate's public funded campaign.

<sup>a</sup>For more information about Montgomery County's public campaign financing program, see Montgomery Cty., Md. Code, §§ 16-18–16-32.

### STRUCTURE

The program is managed by officials from both the Montgomery County Department of Finance and the Maryland Board of Elections, which administer county and state laws related to election administration and campaign financing. In addition, a bipartisan Public Election Fund Committee is responsible for estimating and recommending funding levels for the public campaign financing program for the current year and following year. The committee is comprised of seven county residents appointed by the county council.

The program receives an annual general appropriation, with funding levels determined by the county council in consultation with the committee. The program can also keep unused funds from previous elections to use in subsequent elections and voluntary donations made directly to the program. The council appropriated \$7 million for the 2018 election, and \$5.5 million for the 2022 election.

### PROGRAM REQUIREMENTS

Candidates running for county executive, and county council--at-large and county council--district offices are eligible to participate in the public financing program. To qualify for matching funds, candidates must:

- Register their public campaign financing committee via the state's electronic filing system prior to the qualification deadline.
- File a notice of 'intent to qualify' with the state board of elections.
- Open a publicly funded campaign account with a bank for receiving deposits of contributions and matching funds, and for making expenditures. Any other campaign finance accounts must be closed or kept inactive while the candidate is seeking public funds.
- Collect a threshold of qualifying contributions from county residents, based on office sought.
- Submit to the Board of Elections (1) a declaration agreeing to follow the regulations governing the use of a public contribution, (2) a campaign finance report that includes a list of each qualifying contribution received, a list of each expenditure made by the candidate during the qualifying period, and the receipt associated with each contribution and expenditure, and (3) a certificate of candidacy for a covered office.



### AVAILABLE PUBLIC FUNDING

Candidates who meet program requirements receive a certain amount of public funds for every matchable dollar of a qualified contribution they receive, up to certain limits.<sup>a</sup> Candidates may request matching funds on a set schedule (about twice monthly) by submitting a report that identifies each qualifying contribution received, each expenditure made by the candidate, and all receipts associated with each contribution and expenditure. The state board of elections reviews these reports and determines the amount of public funds to be disbursed, which are processed and paid by the county.

### Qualifying contributions required to qualify for participation in Montgomery County, Maryland's public campaign financing program

Office sought	Number of qualifying contributions required	Allowable qualifying contribution amounts	Minimum dollar threshold of qualifying contributions required
County executive	500	\$5 to \$250	\$40,000
County council – at-large	250	\$5 to \$250	\$20,000
County council – district	125	\$5 to \$250	\$10,000

### Public funding available to each participating candidate in the Montgomery County, Maryland public financing program in the 2022 election

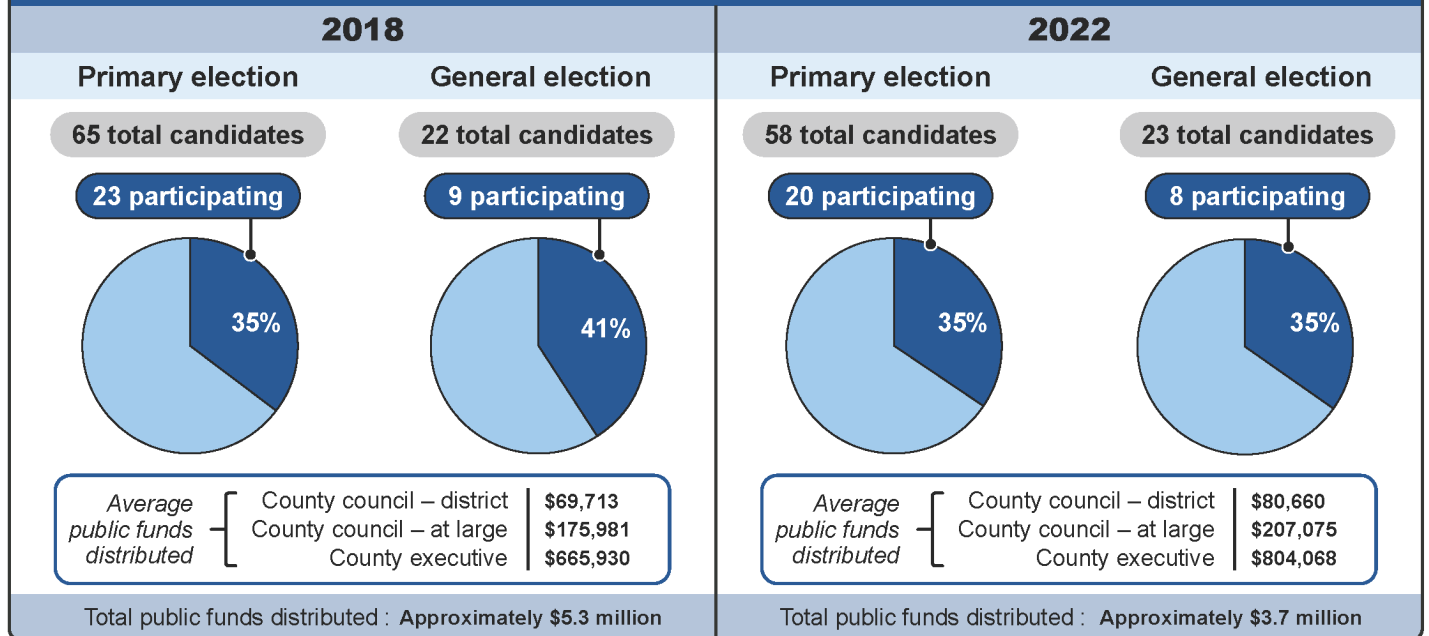
Candidate type	Matching ratio for public dollars	Qualified contribution amounts	Maximum public contribution
County executive	6 to 1	First \$50 for contributions that total at least \$5 <sup>b</sup>	\$750,000 per primary and general election
	4 to 1	\$51 to \$100	
	2 to 1	\$101 to \$150	
	0	\$151 to \$250	
County council – at-large & district	4 to 1	First \$50 for contributions that total at least \$5 <sup>b</sup>	\$250,000 per primary and general election for at-large
	3 to 1	\$51 to \$100	
	2 to 1	\$101 to \$150	\$125,000 per primary and general election for district
	0	\$151 to \$250	

Source: Montgomery County, Maryland public campaign financing program law and documentation. | GAO-25-106650

<sup>a</sup> Non-matchable contributions include contributions from the candidate or the candidate's spouse, or an in-kind contribution of property, goods, or services.

<sup>b</sup> The minimum contribution amount for a match is \$5. Contributions below \$5 will not be matched or deemed eligible as a qualifying contribution.

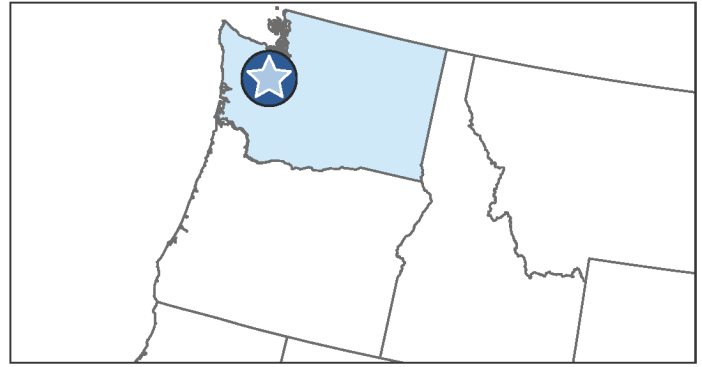
### Candidate participation in Montgomery County, Maryland public campaign financing program for the 2018 and 2022 elections



Source: GAO analysis of Montgomery County, Maryland public campaign financing program and elections data. | GAO-25-106650

# Seattle, WA

## Public Campaign Financing Program: Voucher Model



Source: U.S. Census Bureau. | GAO-25-106650

### HISTORY

Seattle's public campaign financing program was created in 2015 by ballot initiative.<sup>a</sup> The program went into effect for the 2017 election.

Program officials said the program has not

undergone any major changes since its adoption. They stated that the city council had made small changes to the program after the first election during which it was implemented, such as changing the timing of when vouchers are distributed.

<sup>a</sup> For more information about Seattle's public campaign financing program, see Seattle, WA Mun. Code, §§ 2.04.600–2.04.696.

### STRUCTURE

The program is managed by the Seattle Ethics and Elections Commission, which is responsible for administering and enforcing the Seattle Ethics Code. The commission has seven appointed members and a professional staff.

The program is funded through a property tax levy that is authorized until 2025, at which point voters must reauthorize the tax in order for the program to continue, according to program officials. The program receives about \$3 million per year through this tax.

### PROGRAM REQUIREMENTS

Candidates running for mayor, city council, and city attorney are eligible to participate in the public financing program.<sup>c</sup> To qualify for public funds, candidates must:

- Register with the Seattle Ethics and Elections Commission as a candidate and submit required reports.
- Agree to take part in at least three debates for each of the primary and general election.
- Agree not to solicit money for or on behalf of any political action committee, political party, or any organization that will make an independent expenditure for or against any city candidate within the same election cycle.
- Agree not to solicit or accept total contributions from any individual or entity exceeding \$500 (including up to \$100 in vouchers) for mayoral candidates, or \$250 (plus up to an additional \$100 in vouchers) for city council and city attorney candidates.
- Obtain and report the requisite number of contributions (of at least \$10) and signatures from Seattle residents. Like qualifying contributions, qualifying signatures help demonstrate support for a candidate, whether or not the signatory is able to make a qualifying financial donation. Candidates must obtain the requisite number of both signatures and contributions, but these can come from either the same individual or different individuals.
- File paperwork showing an itemized list of qualifying contributions.
- Agree to abide by campaign spending limits.<sup>d</sup>

### Number of qualifying contributions and qualifying signatures required for participation in Seattle's public campaign financing program in 2021 election

Office sought	Qualifying contributions of \$10 or more	Qualifying signatures
<i>Mayor</i>	600	600
<i>City attorney</i>	400	400
<i>City council—citywide</i>	400	400
<i>City council—district<sup>b</sup></i>	150	150

Source: Seattle, Washington public campaign financing program law and documentation. | GAO-25-106650

<sup>b</sup>Half (75) of the contributions and signatures must come from within the candidate's district.

<sup>c</sup> Seattle's city council has nine councilmembers, of whom seven represent a specific district and two are citywide representatives.

<sup>d</sup> Candidates can request to be released from this limit if they can demonstrate that their opponent's campaign spending—or independent expenditures made on their opponent's behalf—exceed the spending limits imposed on the participating candidate.

### AVAILABLE PUBLIC FUNDING

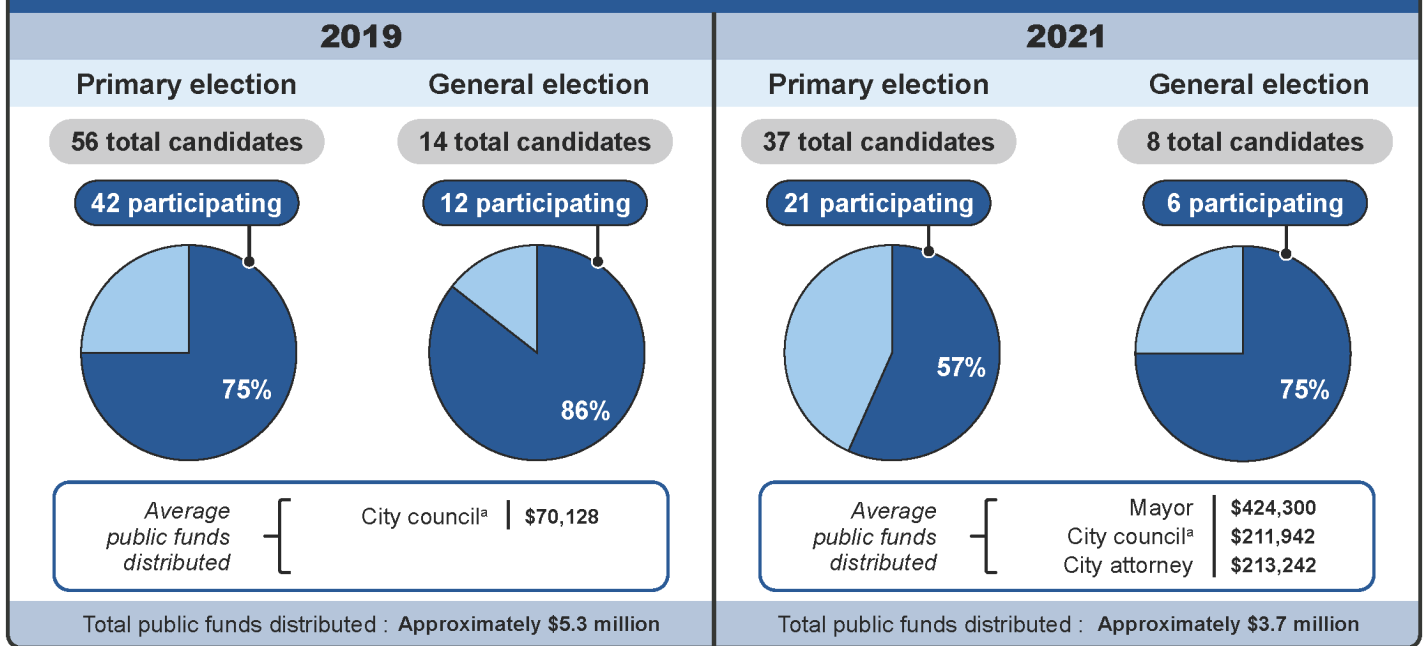
A candidate who meets the qualification requirements can receive vouchers for public funds from city residents. The candidate may collect signed vouchers from residents and deliver them to the commission. Residents may also deliver or mail their vouchers directly to the commission. The commission determines the number or value of vouchers to issue for each election. For the 2021 election, the commission issued 4 vouchers worth \$25 each to a total of 512,746 residents. In total, the commission processed 184,747 vouchers from 48,071 residents in 2021.

### Spending limits for participation in Seattle's public campaign financing program in the 2021 election

Office sought	Primary election	Full election cycle, inclusive of primary and general election
Mayor	\$400,000	\$800,000
City attorney	\$187,500	\$375,000
City council—citywide	\$187,500	\$375,000
City council—district	\$93,750	\$187,500

Source: GAO analysis of Seattle public campaign financing program law and documents. | GAO-25-106650

### Candidate participation in Seattle's public campaign financing program for the 2019 and 2021 elections



Source: GAO analysis of Seattle, Washington public campaign financing program and elections data. | GAO-25-106650

<sup>a</sup> In 2019, elections were only held for district-level city council members. There were no mayoral or city attorney elections in 2019. In 2021, elections were held for citywide but not district-level city council members.

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# Appendix III: GAO Contact and Staff Acknowledgments

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## GAO Contact

Rebecca Gambler, (202) 512-8777 or [gablerr@gao.gov](mailto:gablerr@gao.gov)

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## Staff Acknowledgements

In addition to the contact named above, Tom Jessor (Assistant Director), Michelle Loutoo (Analyst-in-Charge), Carmen Altes, Benjamin Crossley, Dominick Dale, Kelsey Griffiths, Tracey King, Jocelyn Kuo, Amanda Miller, Heidi Nielson, Jeff Tessin, Ashni Verma, and Alexander Waskiewicz made key contributions to this report.

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