City of Portland
Open & Accountable Elections
Participant Experience
Report

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About the Author

Amy Santee is a Portland-based research consultant who works with teams to answer big questions, think differently, solve real-world problems, and impact the world for good. How? Through an understanding of the human experience and how technology can serve their needs. Amy's work has focused primarily on end-to-end product development, innovation, and strategy for digital experiences. She has worked with companies and organizations across the private and public sector, including eBay, Dexcom, Cambia, General Motors, Vetsource, among others. Before joining the OAE Participant Experience project this year, she worked with Civic Software Foundation and The City of Portland to design the tracking and compliance software used during the election.

Introduction

The City of Portland Open and Accountable Elections (OAE) is a public financing program that provides matching dollars to amplify small contributions from Portlanders to candidates running for City office who agree to program contribution limits and other rules.

Matching programs can ensure that every Portlander's voice in our democracy is heard. By doing so, the program can reduce both corruption and the perception of corruption.

Program Summary:

- Candidates who want to participate agree to comply with program rules, like contribution limits.
- Candidates must prove they have broad community support and are willing to do the work to win an election by collecting lots of small qualifying contributions from Portlanders, rather than taking large cash donations.
- Candidates who follow the rules and collect enough small contributions get the contributions from Portlanders matched six-to-one from the City's Open and Accountable Elections Fund, up to $50 per contributor. For example, this would turn 500 contributions averaging $25 from $12,500 into $75,000.
- Contributions are matched up to the overall match cap set by the program.

Project Goals & Key Research Questions

After the November 2020 election, OAE Director Susan Mottet and Deputy Director Daniel Lewkow collaborated with Amy Santee, a Portland-based research consultant, to conduct an evaluation of the OAE participant experience.

Project Goals

- Collect feedback and suggestions for improvement from program participants, including participating and non-participating candidates, campaign staff, treasurers, volunteers, and journalists, on their experience with the program.
- Make suggestions to the Open and Accountable Election Commission for improving the program for candidates, contributors, and the public, including suggested changes to code, administrative rules, internal policies and practices, and tracking/compliance software.

Key Research Questions

- What was the overall experience like for program participants? What worked well and what can be improved for future elections?
- How did OAE impact campaign goals, fundraising, types of contributors, contribution amounts, and competitiveness?
- Understand how OAE contributed to increasing accountability and transparency, reducing financial barriers to participation and contributor impact, addressing corruption and increasing the diversity of candidates and contributors?
- What was the awareness level amongst contributors of the program, and how did they respond to candidate participation?
- How clear and how fair were program policies, requirements, and processes?
- How useful and usable was the program software and public data visualization of fundraising information?

Research Methods & Participants

This study is based on 22 qualitative one-on-one user interviews of 30-60 minutes each (total of 20 hours of interviews), conducted remotely via Zoom. Prior to the interviews, we sent a survey to these users to gather initial feedback.

Our primary users included campaigns for 2020 Portland City Council or Mayor, including candidates, campaign staff, campaign vendors, and volunteers. Campaigns that participated included those which:

- Successfully used the program, whether they won or lost the election
- Filed a notice of intent but did not get certified, or lost certification
- Did not attempt to use the program

We also spoke with:

- Campaign contributors
- Community stakeholders
- A journalist reporting on the election, who used public campaign finance data from www.openelectionsportland.org

Key Research Findings

Below is a summary of key findings, with corresponding detailed findings and program recommendations in the following sections. The intention of the recommendations is to pinpoint areas of improvement for program participation, rules, processes, systems and software that will mutually benefit all stakeholders, including residents of Portland, campaigns, campaign vendors, community-based organizations, and the City of Portland.

Overall Experience

- The most universal and emphatic feedback was that the complexity of the program posed numerous challenges to participation, inclusivity, and overall experience with the program.
- Participants felt that OAE, as it is designed, improves political accountability to residents, reduces financial barriers to running for office, reduces actual and perceived corruption, and increases the diversity of representation of officeholders and communities.
- They believe that the program was successfully executed and that it had many positive outcomes despite this being a brand-new program. They noted various areas of improvement for future elections to create an even more equitable democracy.

Campaign Experience

- Campaigns, including those that did not win their elections, reported an overall positive impact of OAE on their 2020 campaign goals. All of the campaigns interviewed said they would use the program again. Specifically, they felt that OAE helped them achieve many key campaign election goals, like raising funds from a diverse array of small (and often new) contributors, reaching fundraising goals and maxing donations, enabling competitive races, winning elections, etc.
- Still, they observed that those who raised the most $250 donations (the max amount allowed) ended up winning their elections.
- Campaigns expect OAE to have a positive impact on future City elections with regard to diversity of officeholders and political representation, a decrease in officeholders who take large contributions from special interests, and possibly a completely publicly funded election system. They said they would participate in OAE again if/when they run for office in the future.

Treasurer (Vendor) Experience

- Treasurers found the tracking and compliance software to have a good overall user experience for completing tasks and keeping track of fundraising, but there are some areas of improvement that can make it more efficient for reporting and helping campaigns to make timely decisions about how to use their funds.
- Specific areas of friction included entering donations individually, determining the reason for the status of matches, validating contributors as matchable, sharing new contributor attestation, and tracking aggregate donations.

Program Policies, Rules and Processes

- Users would like to see further simplification and clarification of various program rules, many of which were too complex to easily comply with.
- They would like the certification process to be easier.
- Some of the rules and processes around seed money, match rate and match limit, and in-kind donations worked well (e.g., max of $5,000 seed money), while others caused issues on various fronts (e.g. confusion between OAE and Honest Elections rules).

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- A big area of friction for campaigns and treasurers stemmed from the issue of the OAE and State of Oregon Elections Reporting software (ORESTAR) timing not being in sync, which caused a lot of extra work, increased expenses, and general frustration.
- A common point of confusion was around the relationship between OAE and the Honest Elections program (City of Portland Auditor's Office), which one person described as "clear as mud." This created unnecessary challenges for complying with program rules.

Voter/Contributor Awareness and Participation

- Campaigns had difficulty explaining OAE to contributors, especially when it came to the matching amounts and rules. They want to be able to easily communicate about it to the community.
- Campaigns would consider not taking in-kind donations in the future because they spent a lot of time and money dealing with coordinating them and compliance.
- Campaigns reported that new or lower-engagement contributors felt like the program made their contributions and participation matter to election outcomes because their money went further than the original donation amount.

Community Stakeholder/Contributor Experience

- Community stakeholders highlighted several achievements of OAE, including a positive impact on their organizational and advocacy goals like increasing contributor engagement and campaign success.
- While organizational in-kind contributors acknowledged some clear benefits to campaigns of participating in OAE, and encouraged candidates to participate, they felt that the program could do even more to make elections more competitive between program participants and non-participants, and between political newcomers and established candidates.
- These challenges caused mixed feelings on whether or not they would recommend campaigns participate in the OAE program in the future. They would be likely to if these issues were resolved and the program rules and process were clearer and simplified.

Additional Key Findings

- Feedback on the data visualization of fundraising activity at www.openelectionsportland.org was positive with regard to the type of information it shows and its overall purpose in creating transparency, but there was a general lack of awareness and limited use of the website amongst participants.
- However, the journalist interviewed used the data visualization for their reporting during the election, which they used in conjunction with State level data.
- The program illustrated the value of partnerships between local government and civic organizations (e.g., Hack Oregon/Civic Software Foundation, which built the tracking software in 2019) to improve democracy through innovative methods and efficiency in development time and costs.
- Campaigns would like to see a significant increase in outreach by the City to help with voter awareness of the program, which would likely contribute to an increase in voter contributions, campaign success, and overall OAE program success.

Detailed Findings & Recommendations

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Campaign Experience

Overall program feedback

Campaigns highlighted several major achievements of the OAE program for the 2020 election.

- There was an increase in diversity of candidates and contributors (race, ethnicity, income, neighborhood, etc.), resulting in more diversity of officeholders and constituent representation.

  "The fact that [OAE] exists allowed someone like me to run."

  "Our highest employment category of donor, by about three times as much as the next category, was "not-employed.""

- The program brought out people who had never donated money to a campaign before to support community representatives running for office. Contributors appreciated that their small contributions would go further, and had more confidence in the electoral system.

  "Portlanders had more opportunities to voice their concerns and hear directly from candidates than they would in typical campaigns."

  "It brought me great joy and satisfaction to witness people who had never given to a candidate before donate to my campaign because the public matching program made them feel that their small contribution and their voice mattered as much as wealthy people in the city who have long been capable of writing big checks to political campaigns."

- OAE rewarded campaigns that worked hard to include a variety of contributors, and those that had existing community networks who support their candidacy.
- The program illustrated the value of partnerships between local government and civic organizations (e.g., Hack Oregon/Civic Software Foundation, which built the tracking software) to improve government through innovative methods and efficiency in development.

Campaigns expect OAE to have a positive impact on future City elections with regard to diversity of officeholders and political representation, and fewer campaigns that take large contributions. They see it as a positive step toward a completely publicly funded election system in which all candidates opt into the program.

- They expect an increase in voter demand for candidates to use the OAE program and not take large contributions. They believe it will become the status quo for local elections.

  "I expect OAE to fundamentally reshape City Hall politics. Not participating in OAE is a bad look."

Campaigns, including those that did not win their seats, reported an overall positive impact of OAE on their 2020 election goals, noting that as a result they would use the program again. They were able to:

- Run a competitive campaign against established candidates who accept large donations.
- Reach fundraising goals and max out matching fund limits.
- Raise enough to compensate campaign staff appropriately and equitably.
- Engage Portlanders who have not previously been engaged in local politics.
- Spend more time with voters in the community to learn about their issues rather than spend their time fundraising from large contributors.

Campaigns outlined several core aspects of the program that worked well, especially for a brand new program.

- Contribution limits for contributors to minimize undue influence of big contributors and maximize participation of small contributors.

  "It was freeing. We're asking for small donations and not just trying to reach special interest groups or corporations. If I took that money, would that come with an expectation. OAE made me feel like I wasn't beholden to anyone. Allowed me to reach people."

- Ability for participating candidates to increase the fundraising cap if a non-participating candidate fundraises beyond a certain amount.
- Helpful training from OAE staff to prepare campaigns for program participation.

  "The training allows for a better sense of inclusion for people running. In the past, you'd be in the dark about campaign financing. This makes it a big difference."

- Availability and helpfulness of OAE program staff to assist campaigns and answer questions in a timely manner.

  "Excellent experience communicating with staff. They were highly communicative, open to feedback, and accommodating of our needs. Could not imagine being more pleased."

  "The staff were also incredibly helpful and supportive. As a first time candidate (and for my staff who were new to campaigning), this was greatly appreciated."

  "The circumstances were difficult, between the pandemic and special election. I appreciate how staff kept us in the loop about if OAE didn't have enough funds to cover special at the 6-1 match. And I appreciate offering to answer questions and being available."

- Functional and mostly user-friendly software that enabled streamlined tracking and matching through digital rather than paper means.

- Given that it was a brand new program, candidates were impressed with the quality of its first implementation, and would participate again in the future if/when they run for office. They expect that program changes will be made to improve the campaign experience and outcomes for the future elections.

  "The program is on the right track and it needs to improve, which is common after the first rapid implementation. The most improvements will come from this experience. Most policy doesn't get implemented, so bravo."

Campaigns faced various challenges with the program as a whole, which are addressed in more detail in subsequent sections of this report.

- Campaigns observed that those who raised the most $250 contributions (the max donation) ended up winning their election.
- Lack of clarity around various program rules and how they related to other laws such as state law and Honest Elections, especially with regard to contributions, in-kinds, and expenditures.

  "I like the controls in place. In this program, I thought the controls seemed really good. I recall Voter Owned Elections; there were all kinds of problems with that program. Nobody congratulates people about that. The [OAE] rules were clear for participants, unlike those who were not participating - for whom it was extremely opaque and nowhere to get clarification. It is really important to differentiate between OAE and Honest Elections. Honest Elections was super confusing. OAE had fewer bumps and issues. ... When we tried to get interpretation of rules, you are told the Auditor doesn't give legal advice, but her office still rules on the complaints and busts our campaign. No one will do it again unless they are either really informed or really uninformed. OAE aced it on giving advice…. OAE was like a concierge who wants you to succeed. For that alone, especially for brand new campaigns, I would tell people to use the program. I support OAE running Honest Elections. You have proven yourself to be really competent administrators of your program."

- Confusion about campaign finance rules between OAE and the Auditor's Office which enforces Honest Elections – who is overseeing which rules? How do they work together? Who do I ask when I need help? Whose advice do I take to avoid legal issues?
  - This made it challenging to interpret and follow rules (and sometimes seemingly conflicting rules), and prohibited streamlined, efficient communication between campaigns and the two offices.
- Campaigns manipulating the complaint process to seize on any signs of competitor rule-breaking to create negative media coverage, even if no rules were broken.
- A big area of friction for campaigns and treasurers stemmed from the issue of the OAE and State of Oregon Elections Reporting software (ORESTAR) timing not being in sync, which caused a lot of extra work, increased expenses, and general frustration.
- Providing documentation along with contributions that weren't made online, posed a challenge to some campaigns and some contributor types;

  "Mostly elders frustrated with the over the top compliance for those who wrote checks. Those who paid online did not experience that. ... Elders could least manage the scrutiny for screwing up compliance, and they could handle it the least. What you had to fill out online was easier than the cumbersome process for filling out forms for checks. I lost some donors out of frustration. People of a certain age are used to writing a check. … It came across as ageism."

- Difficulty explaining the OAE program to the public, especially when it came to the matching amounts and contribution limits and rules.
- Delays in receiving funds, while staying compliant with program timelines for reporting and spending funds, to enable spending money in a strategic, timely, and effective manner.
- Data entry of individual contributions into the software eats up a lot of time, which could be spent on other campaign activities.

Campaigns also faced challenges *not related* to the OAE program, but which OAE could potentially help address for an overall more successful outcome.

- It costs *a lot* to run a campaign, and funds are tight even for campaigns receiving matches. This causes strain and stress on resources and people. For example, campaign staff are historically underpaid for the amount and importance of work they are doing. Additionally, everyday life expenses like childcare, food, and accessibility are not considered.

  "A candidate salary - paying yourself to run for office would help. Folks that don't have financial backup funds struggle to make it work. So being able to pay yourself would help lower income people afford to run for office."

- Treasury services are expensive. Limited options means that prices are high due to what some consider to be a near monopoly by the largest service provider. More competition in this space could mean lower costs for campaigns, and money could be put toward voter outreach, which campaigns consider to be the most important aspect of running and winning.

  "One month I raised about $800, and I got the treasurer bill and it was $800. Those start up costs and beginning costs and the admin costs are a huge burden on low income people. I basically Facebook messaged all of my kickball friends, and that is how I raised my money."

- Candidates would like to see the OAE program accompanied by additional electoral reforms including geographic district-based elections and ranked-choice voting, to further increase diversity in representation and the effective functioning of democracy. They feel that OAE is only one part of larger desired democracy reform.

- Running a campaign is a challenge for anyone, especially for political newcomers who don't have experience. This put a strain on newcomers that established candidates did not have to deal with.

Program Recommendations

- Simplify program rules and processes, to improve all users' experience and be more inclusive.
- Expand OAE training to help political newcomers know how to effectively run for office so they are more competitive with experienced candidates. This could include direct training, guides, and resources. This will further address the goal of inclusivity in participation to make sure that people who have no political experience are set up for success.
- Sync and simplify fundraising and reporting processes, timelines, and rules to remove friction and lessen time spent on administrative activities and systems, including tracking software.
- Run both OAE and Honest Elections out of the same office, and coordinate with the state to improve the overall campaign experience and cut down on confusing or duplicative efforts to remain in compliance with campaign finance reporting and rules.
- Improve the usability of the tracking software. Continue the partnership with Hack Oregon for efficient, low-cost software development.
- Increase simplicity by expanding the list of expenses that can be covered by matchable or non-matchable funds.

Communicating OAE Participation to Contributors

Small contributors and community representation were at the core of participating campaigns, but campaigns reported mixed levels of awareness of OAE among the public. They made sure to talk about their participation in the program at every opportunity, but found it somewhat challenging and time-consuming to explain to contributors.

- Tying donations to larger political themes such as "people power," "community," and "big money" were highly effective.
- The 6-to-1 match confused some contributors, who did not understand how it worked. Campaigns found it challenging to explain it in the simplest way possible.
  - Nuanced rules added to the confusion, such as how the first campaign to get money from a contributor is the one that gets the match, or how many times they can donate/how much per time.
  - When a contributor gives to more than one candidate in the same race, only one of those donations can be matched. The program established that the fairest way to decide which campaign received the match was to award the match to the campaign that reported the donation first. However, campaigns disliked the uncertainty of whether they would receive the match, and the arbitrary nature of the match going to the donation that was logged first, not the one that was contributed first.
  - These issues were cumbersome enough that some campaigns minimized their focus on messaging it to contributors. Campaigns that gave a less accurate description of the program by skipping over the more confusing parts, reported the most success in gaining contributors' confidence in them and the system.

"The more words I have to use to explain campaign finance law [to] voters, the less they trust the system."

"Everyone was confused by the math because the 6-to-1 match is a 7X match. People were constantly interchanging them. If there's a solution to this, we didn't find it. The general public doesn't have the capacity for that. They want to talk about what it totals. Go with...whatever is simplest. It was something we spent a lot of time on."

- Some wish they had not accepted seed money or in-kind donations so they could have said from day one that they never took more than $250 from any contributor, and that they only take money from individuals.
- Campaigns that didn't have trouble talking about the program were the ones who did not mention issues with the seed money or in-kind donations.

Campaigns would like to see a significant increase in outreach by the City to help with voter awareness of the program, which would likely contribute to an increase in voter contributions, campaign success, and overall OAE program success.

- They felt that they were on their own when it came to doing outreach and education about the program, and could have used more help from the City.

"I'd like the City to be more visible in talking about the program and how it amplifies your dollar and therefore amplifies your voice. The candidates were all in the know. But it felt like mostly us communicating that. I think part of it was because it was new and the kinks were being worked out. I think in this next phase, we should really communicate this to the people. People really loved the idea. I think if more people knew about it, more people would do it. That was a

big part of my message; I am not being funded by big business; I am being funded by the people."

Program Recommendations

- Change the program name to something more clear and straightforward, like Small Donor Elections. Many Portlanders confuse Open and Accountable Elections with the Honest Elections ballot measure from 2018 and the name isn't descriptive enough of its purpose.
- Improve public outreach about the OAE program to increase contributor participation and contributions to OAE participating campaigns. Provide a clear explanation of the program and its goals, and more widespread messaging. Train campaigns on how to communicate this to contributors so they have a strong and impactful message.
    - o Partner with local community organizations to get the word out. Outreach could happen during the election and in the off-season, through traditional means like City meetings, neighborhood organizations, social media channels, and local media.
    - o Outreach can also help with accurate reporting in the local media. Consider training or a FAQ specifically for journalists.
- Allow contributors to split their matchable contribution between candidates running for the same seat. Campaigns want this and so do some contributors.
- Reform campaign seed money rules to now allow over $1,000 per contributor.

Clarity and Fairness of Program Rules

Overall, the rules and process of filing the Notice of Intent to participate, certification requirements, and timeline, were perceived as clear and fair by campaigns, with a few exceptions.

> *"I think we should be able to give to our own campaign - no more than $250. And, no seed money of $5,000 from a candidate."*

- Some initially thought that this would be a steep climb, but they understood the importance of proving that you have a viable campaign that would be taken seriously by contributors and competitors.

> *"At first we thought this would be a burden, but it turned out to be an asset. Reaching that first [qualifying contributions] with a compelling argument forced us to craft a platform and messaging with broad popular appeal and to reach a wide audience. Talking to donors during the qualifying period was one of the most transformational aspects for me as a candidate."*

- Some felt that the minimum number of initial contributors was just right, while others felt they were too low and would like to see an increase in requirements for initial supporters to qualify for the program. Some felt that the number was a bit high and would prefer the qualification to be a minimum number of signatures.

Campaigns had some suggestions for making the certification process easier.

- Some found it needlessly difficult to have to raise all seed money before being permitted to start collecting qualifying contributions after filing the Notice of Intent.

> *"You should be able to file your Notice of Intent and raise seed money at the same time."*

- Candidates had different experiences with the certification process. Some found it easy to navigate. One newcomer candidate mentioned having challenges with getting certified as quickly as established candidates. This had an impact on their ability to hire staff, advertise and do other campaign activities, due to the amount of work that is involved in getting up and running. It seemed to directly contradict the purpose of the program to enable races to be more competitive, because some campaigns were in essence starting later than others.

  "We were constantly looking at the data and appreciated how up to date it was. And the certification process was good because staff would keep us in the loop about how many were [validated] and how much more we needed."

  "Everything felt in limbo because we didn't know if we could bring staff on, because we didn't know if we would get the matching funds. Some candidates got certified in a week and got up and running faster. Current and former politicians are putting their name out, and sucking the air out of the room. It was hard to get news coverage and to get taken seriously."

Program Recommendations
- Eliminate the petition requirement for certification.
- Keep the Council qualifying contribution to $250.
- Permit a second certification application if the campaign is denied the first time.
- For qualifying contributions, eliminate the amount required ($5,000), but maintain the number of contributions (500).
- Instead of prohibiting campaigns to collect seed money after they file a Notice of Intent, change this to state that they can't collect seed money after they apply for certification, which takes place after the NOI.
- Allow seed money contributions of no more than $500 per contributor, totaling no more than $5,000. Apply this to transfers from past campaign committees.
- Adjust the number of qualifying contributions for the Mayor's race to 750.
- Make it easier to qualify for the program by eliminating the petition requirement which is redundant to other qualification requirements.

Tracking, Matching, and Spending Funds

Campaigns found some aspects of the timeline and process for tracking and matching were cumbersome and time-consuming. This was time and effort that could have been better spent on community engagement and other activities (especially by volunteers). Across the board, participants emphasized overall simplification of program rules.

Examples include:

- Entering individual donations was time intensive.
- Determining day-to-day status of matches for each contributor, and overall match status.
- Inability to validate some matchable contributors.
  - Validation rate is around 90%, but being unable to validate 10% of donations is a lot to manage.
  - Postcard method for validating unverified contributors was slow.
- New contributor attestation form needed for each donation.
- No way to track aggregate donations for OAE, unlike with ORESTAR.

Uncertainty about disbursement amounts made it difficult for campaigns to know how and when to spend funds due to lack of clarity on where their finances stood.

> *"It's hard to tell a treasury vendor we're good for it because the matching money was coming in. There should be a way to make estimated disbursements or expedited disbursements of matching funds. One mailer was going out the door and it was almost delayed due to not having money, but I was able to show them the email from OAE saying the money was coming."*

- To some, the cutoff for raising matchable contributions three weeks before the primary and general election seemed counterproductive to the goal of inclusivity because less engaged voters don't realize an election is happening until it is too late to get matched. The last three weeks is an important time to raise and spend as much money as possible to maximize outreach and votes.
- OAE and ORESTAR (State of Oregon elections reporting) are on different timelines. OAE requires reporting every two weeks, and ORESTAR requires reporting within 30 days of a contribution or expense, until closer to the election at which point it goes down to seven days. This creates unnecessary hassle for tracking contributions and matches.
- The postcard method of validating contributors as matchable who weren't found on the voter registration list was slow and inefficient.

> *"The postcard system seemed inefficient. I wonder if we can call or email people in addition for a more rapid response. The postcard was so slow and we'd call them to follow up and a lot of time they didn't get it or check their mail. I am all for electronic means."*

Program Recommendations

- Improve validation process for easier validation of all matchable contributions. An alternative to postcards is needed, preferably digital.
- To avoid the hassles of abiding by two different reporting timelines, change the code to require reporting to OAE on the same timelines as ORESTAR.
- Increase frequency of disbursements.
- Loosen spending prohibitions: apply only to matching funds in order to simplify compliance, eliminate prohibition on election night parties, eliminate prohibition on paying loans or debts, and eliminate prohibition on paying for professional services related to appealing OAE determinations.

Seed money, match rates and limits

Some of the rules and processes around seed money, match rate/limit, and in-kind donations worked well, while others caused issues for campaigns on various fronts, including:

- Max of $5,000 in seed money is a good amount to get a campaign started.
- Lack of clarity as to whether seed money qualifies for disclosure rules.
- Ability for candidates to give themselves $5,000 in seed money.
  - This seems counterintuitive to increasing competitiveness of people who can't get large contributions since the people who cannot afford to do this must spend more effort and time collecting seed money from contributors. It also contradicts the ineligibility of candidates to contribute money to their own campaign as a contributor.
- Inability for candidates to donate to their own campaign.

Given how expensive it is to run an effective campaign, some felt that the total fundraising limits ($380,000 primary + $570,000 general for Mayor or $250,000 primary + $300,000 general for Council/Auditor) were limiting.

- It was complicated to raise all the way up to the cap while coordinating incoming donations and matching funds to ensure they did not accidentally go over the cap.
- They would like to see the cap raised, perhaps to the same amount as the max for the Mayoral race, which they don't see as any different from a City Council race.
- They feel that raising the cap will enable OAE candidates to be even more competitive with campaigns that do not participate in the program and who are able to raise more money with fewer but larger donations.

    "Raise the cap! For council races, $550K is enough to sustain your organization for 18 months and send out 6 mailers, plus some digital. Barebones budget plans like that incentivize independent expenditure campaigns, which is clearly what's gonna happen starting in the 2022 election cycle."

    "The limits are important. $250k for the size of the [city] is too little. Staff doesn't get paid very well and can't get your message out. I don't know what the number is. My experience is [low limits] will incentivize more independent expenditure campaigns."

- Some campaigns liked the idea of lowering the match rate/matchable amount to increase representation and participation of voters with lower incomes. They did not feel it would be an issue to raise money from more contributors. Other campaigns said they would like to keep the match rate at its current level because it worked well and there were no downsides to it.

    "It would be helpful [to lower the match rate] in the sense that people who got smaller donations like I did, it sounds like I would get more. I think that for me that would have made a difference because most of my donations were $5–25. That is within an everyday person's budget. $50 is not. So, yeah, I like the idea."

    "10-1 on the first $20/25 is good. like 10x because of easier math [when explaining the program to donors."

Program Recommendations

- Permit candidates to give matchable contributions to their own campaign, and clarify rules around this.
- Consider reforms to the in-kind allowance.
- Raise or eliminate the total fundraising limits.

Relationship between OAE and Honest Elections

As mentioned previously, a common point of confusion between OAE and the Honest Elections regulations voters passed in 2018 (enforced by the City of Portland Auditor's Office). This created unnecessary challenges for complying with program rules.

Campaigns would like to see the two programs enforced by the same office to streamline the process of participating and staying compliant with already complicated election rules.

- They wondered why all City election programs aren't under the same department.
- In general, they would like to see election programs overseen by an independent entity that is not housed within an elected official's office.

Overall, campaigns felt that the process and rules around OAE program penalties and complaints were fair. However, they recognized a disconnect between OAE and Honest Elections when it came to rules, processes and communication about infractions. Many challenges with the Auditor's office were incorrectly attributed to OAE.

- Their experience communicating with OAE staff to ask questions and resolve infractions was timely, fair, and oriented toward helping campaigns succeed. On the other hand, they described the tone and quality of communication with the Auditor's office around Honest Elections compliance and enforcement as "punitive" for minor, unintentional infractions. Campaign treasurers felt similarly.

  "When we tried to get interpretation of the rules, we were told the Auditor doesn't give legal advice. But the office still rules on the complaints and busts our campaign. OAE aced it on giving advice. They want you to succeed."

Program Recommendations

- House OAE and Honest Elections together in a single department and align rules and processes, streamline participation, and improve the overall experience and success of participating campaigns. This will also reduce time and resources spent on the City side. Ideally this office would be independent from elected officials.

Treasurer (Vendor) Experience

Overall Program Feedback

Campaign treasurers reported a good experience with OAE rules and processes, with some suggested areas for improvement.

- OAE staff communication was helpful and timely.
- The training was effective, but it didn't include a component for how to use the software.
- The program manual was robust, but the complexity of the program meant treasurers were experiencing challenges with finding information and parsing rules, which would cause people to have to look at the original City Code or contact OAE staff.

  "If you are looking at the code, you are not accomplishing your mission."

- As with campaigns, treasurers experienced discrepancies between how OAE and Honest Elections handled complaints and penalties.
- The rule that donations cannot be matched if another candidate received a donation match presents a challenge for easily tracking such cases. It is also based on who submits the donation first, not the date or time of the donation.

Program Recommendations

- Incorporate software training into the overall program training.
- Improve the clarity and usability of the program manual.
- Align Honest Elections and OAE enforcement, complaint, and penalty processes.
- Permit contributors to split matchable contributions between more than one candidate running for the same seat. Match the first donation that occurred.

Donation and Expenditure Reporting Software

The overall user experience with the donation and expenditure tracking and matching software worked well, with some room for improvement to streamline the process for data entry.

- Users appreciated aspects of the software that improved workflow efficiency, such as digital attestestations, the ability to download data within a specified date range, autofill on donation address, and intuitiveness of navigation and using features.
- There is no search feature, so users can't easily find what they have already entered other than by scrolling through entries.
- Manual data entry was challenging, and there is no ability to do bulk uploads. This also increases the likelihood of errors in the data.

  "I spent a significant amount of time doing data entry and checking to make sure individuals didn't give over the max. With the seed money it isn't always clear by looking at ORESTAR. We really need to be able to upload via a spreadsheet as it was incredibly difficult to enter every single transaction."

- Difficulty determining match amounts and making educated spending decisions. Match amounts felt more like a range than a specific number.

  "I felt like there was a range of how much money I might get. I would tell my clients the low range because I didn't know. If you are doing it under a tight deadline that's hard, it makes a difference in how much media you can buy, how much of everything you can purchase. Knowing when that money will hit, that affects our cash flow, how much mail we can purchase or lawn signs"

- The sorting by date button on the main contribution and expenditure pages only sorts by oldest to newest, and not newest to oldest. Users have to export a file and sort that way to see the most recent submissions.
- The software does not help with duplicate contributions, let the user know if funds are matchable, or alert the user to voters who have already given the maximum allowable amount.

  "Every candidate had someone who gave twice, just because they forgot. I don't think they were trying to dupe the system. I spent a lot of time going through and checking to make sure - and we didn't have a great way to do that besides using a Google doc. Even going through ORESTAR and checking your donors through ORESTAR, it doesn't mean they are over the limit."

- Inability to amend transactions and delete an accidental double entry.
- Inability to see exactly where a donation is in the process of getting it matched and disbursed.
- Lack of clarity on how to properly report reimbursement checks that covered multiple expenses. They would like this to be two separate transactions (expense and reimbursement).
- Transaction updates do not specify what the change was.
- Some of the desired features discussed with treasurers during the 2019 development of the software were missing (e.g., bulk upload, search).

  "The software has a lot of issues that need to be worked out, and I think most of that is due to the fact it was created so quickly before the program started. There are a lot of things that don't work, or don't work properly, things that need to be added/changed especially in regards to "Other" types of income/expenditures."

One of the biggest challenges for treasurers is that the OAE software does not integrate with the State of Oregon's reporting software, ORESTAR, resulting in a cumbersome process and significantly higher workload. The timelines for reporting are also different.

- This made it challenging to reconcile records and identify any differences in data discrepancies.
- Double entry on transactions added to the workload, and was exacerbated by needing to manually enter data into the OAE software. Batch and digital uploads would help with this.

  "If OAE wanted to really help out small campaigns, there would be a way to export contributions from OAE directly into ORESTAR, saving the candidates the double entry expense."

- In addition to a disconnect between the two reporting systems, there is also a discrepancy in reporting timelines between OAE and the State of Oregon. Treasurers had to spend time on the weekends reporting information due to the timeline difference.
- Differences in type fields for categorizing entries between the two systems added challenges with data entry (it's not one-to-one).
- These issues lead to increased time spent by treasurers and therefore campaigns and OAE staff.

Additional requests for software improvements:

- Address book functionality to avoid having to re-enter contributor information for repeat contributors.
- Ability to see unmatched transactions with reasons.
- Ability to make note of supplemental information for matching (e.g., voter ID).

Program Recommendations

- Integration with ORESTAR.
- More frequent distributions and precise amounts for matching dollars.
- Improvements to workflow efficiency and data entry including the above requested features and functionality.
- Continued iterations on the software in partnership with Hack Oregon/Civic Software Foundation, including usability testing.

Community Stakeholder Experience

Overall Program Feedback

Community stakeholders who donated in-kind contributions to campaigns noted the following program accomplishments.

- Positive impact on organizational goals, including outreach to and engagement of voters in communities of color, and the successful campaigning of candidates they supported (including people of color).

  "OAE was good because it made financing a little easier, especially since the limits make it harder to raise money. For people who don't have access to a lot of funds, it's a helpful tool. I'm telling people about this. If you have limits, you need this to balance it out. It's important to increase the voices of people who are unheard."

  "It proved that such a program is viable and positive. I think with more cycles and some tweaks it could be even better at increasing participation both from potential leaders and from the community members engaging in the process."

- They described OAE as a solid overall program that remained engaged with campaigns and the community, pivoting when necessary and learning from experience.

  "Overall it was great. This was a decent trial by fire, even though someone tried to defraud the program and was kicked out. Many of the things that could have happened happened. And the program still proved itself. The policy was sound, and the structure and the operation was strong. The program's adaptability was good too. Especially trying to catch issues before they happened."

- They felt that OAE presents a good model that could work at and impact higher levels of government.

  "It creates a solid pathway for non-traditional candidates to raise funds with small dollars and really compete. I wish a similar program existed at the state or county level for that reason."

While these organizations encouraged campaigns to participate in OAE, and encouraged candidates to participate, they felt that the program could do even more to increase competitiveness between program participants and non-participants, and between political newcomers and established candidates.

These challenges caused mixed feelings on whether or not they would recommend campaigns participate in the OAE program in the future. They would be likely to recommend it if these issues were resolved and the program rules and process were clearer and simplified.

- They felt that the costs of running a campaign almost outweighed the value of participating in the program, the point of which is to have easier access to funds to run a competitive campaign. For example, a large portion of funds had to be dedicated to paying treasury vendors that campaigns thought were expensive.

"Generally yes [I would recommend the program]. The costs, potential huge penalties, aren't worth the clear benefits, including the match, because of costs related to campaigns."

- As with the campaigns themselves, organizational contributors felt that there were a lot of administrative burdens that got in the way of more important campaign activities like spending time with the community. Additionally, they spent a lot of time on interpreting and complying with program policies.

"Candidates need to do a cost-benefit analysis on how much they can spend on reporting. One candidate got an invoice from a vendor that took almost all of her campaign cash. But these vendors are only making so much."

"It was a lot of extra time and effort for them. It's a shame that they had to do the double reporting with the City and the State."

"In the state's reporting software, ORESTAR, the software automatically tracks the aggregate. For anyone who tries to track an aggregate for OAE, it's very challenging. It's an administrative problem if you don't have access to fancy software."

  o A good example of this is the cost of per-transaction reporting for smaller donations versus larger ones.

"Candidates who raise smaller donations, so the compliance cost is higher. Some vendors charge a flat amount for every donation reported. So if you raise $100 in $10 increments, that's more transactions to charge for vs a single $100 donation, which means you're only getting charged once."

- They want to see an adjustment to the cap on in-kinds and total fundraising cap.

"I think the overall [fundraising] cap creates a problem; as someone not using the program has no total [fundraising] cap and although it is difficult, it is still possible that a non-OAE candidate could seriously outraise an OAE candidate."

"The in-kind cap could use adjustment, even if you lower the individual cap but similar to the total cap, remove the total in-kind cap. It restricts organizations (including and especially community and labor orgs) from participating in ways that could actually assist in the overall goals. In general I think there are a lot of grey areas around in-kinds. Tweaks could keep in the spirit of the law while also furthering the program's goals."

- Lack of clarity around in-kind donation and disclosure rules, and the time and effort it takes to parse these to avoid penalties, some of which felt frivolous.

"Most people view the legal system negatively. It is scary to get a notice letter. It makes people not want to participate in elections."

"It's challenging to understand for campaigns. There's a lot of gray area for organizations to challenge it in court."

- State law related to the timeline for reporting in-kind contributions, which OAE reporting requirements adopted, did not account for the reality of how and when money was donated and spent.

"In-kind reporting was a real problem. We overestimated the amount that we wanted to give, but didn't actually get to the amount that we expected. But we still had to report the expected

amount beforehand. And didn't have a way to go back and correct. We're $2000 short of what we'd say that we'd in-kind, and we couldn't correct that. So we couldn't give the full amount. Some in-kinds are clear, like mail. We shouldn't have to report in-kind until after they happened. But we couldn't do that because of the OAE reporting timelines. So we had to guess how much we'd have to spend. Which if we went under or over, we'd be in trouble."

"It would be cheaper for the candidate if money could be released earlier. Candidates spent more money on TV, because money went out later. Once you get late, you can't pre-schedule things and that costs money."

- They felt that the options for in-kind donations were limited and should be expanded to be more inclusive of the candidates that OAE targets for participation, such as childcare, food, multilingual outreach, and accessibility.

"Volunteer support coordinated by staff (especially if staff are paid better than campaign staff are paid) quickly adds up. Multilingual outreach, child care and food at events. Those examples particularly apply to people who aren't often part of writing the rules, people who work different hours or need a translator. The real cost of providing these things is expensive. If we keep doing Zoom, what about closed captioning? Or transportation costs. These are baseline things some people need to exist."

- Confusion about the relationship between OAE and Honest Elections.

"From a candidate perspective, everything needs to live in one place, with one person in charge and one phone number. The auditor being in charge of honest elections is challenging."

"The rules between the programs need to be aligned. The Auditor's office doesn't seem like it wants to help. OAE does seem like it wants to help and is responsive. We need one point on this, and one arbitrator."

Program Recommendations

- Clarify in-kind donation and disclosure rules to reduce infractions and the time and effort spent on dealing with them.
- Showcase the program with various government offices to communicate its value for strengthening democracy and elections, including the partnership with Hack Oregon/Civic Software Foundation for software development.
- Eliminate total fundraising cap.

Public Data Visualization of Campaign Fundraising

Feedback on OpenElectionsPortland.org

The purpose of the OAE Public Data Visualization website was to increase accountability in City elections and provide transparency into campaign finance. It hosts a real-time dashboard that shows contribution information (amounts, demographics, comparisons, etc.) for participating and non-participating candidates.

This dashboard (along with the campaign/City tracking and matching software) was built in 2019, in partnership between the City's Open and Accountable Elections program and the [Hack Oregon/Civic Software Foundation](.).

We received feedback from campaigns and organizational stakeholders.

- Feedback on the data visualization website was positive with regard to the type of information it shows and its overall purpose in creating transparency. Participants felt that it exemplifies an innovative model for government-tech sector partnerships focused on civic design.

  "The contribution and data visualization dashboard helped increase transparency and educate the public about how local candidate campaigns are funded. I would really champion the success of that civic partnership. What we need to model is that the government doesn't have to be on its own to have good outcomes."

- While some campaigns occasionally used the data to keep tabs on competitor fundraising, there was a general lack of awareness and limited use of the website amongst campaigns, as well as organizational stakeholders.

  "I wasn't aware of it, which I think is more just my own ignorance due to being overwhelmed and because my orgs weren't really needing to monitor anything. I think this looks like good data. I'd need to give it more time to really think how it would be useful for orgs such as ours."

We spoke with one journalist who used the public data visualization for their reporting during the election. They found it to be a useful way to explore aspects of campaign fundraising at the City level, in conjunction with tracking State level data, and to report on individual campaigns throughout the election.

- This journalist was specifically interested in using it to report on individual candidates rather than money in politics as a whole.

  "I followed it as a new program that really helped some campaigns raise money and get off the ground… and helped people have trust in a system that they felt was not working. During the election cycle I relied a lot on the SOS page on fundraising basics, but I know that is where a lot of this data comes from. I am more familiar with that. But the visualization on OAE that is not on the state's site is super interesting for me. This is something that bigger newsrooms than ours can put together. I did rely on the state mostly, but used OAE to look into City candidates. Both a tool and a values statement."

"There's not as much reporting on money in politics because fewer people are taking big donations, and that is what stories are usually about."

- They used the site primarily at the beginning of the election season to see who was using the program, and to keep track of fundraising data toward the end of the election.

- They appreciated the transparency and efficiency provided by the website and its visualizations.

"It seemed like OAE wanted to make sure all boxes were checked and going the extra mile."

"I'm not allowed enough time with my job to do enough reporting on what [campaign fundraising] looks like, looking over different sizes of donations."

"I really enjoyed the map. Fascinating to see where money is spent for certain candidates. That was an area I was more interested in. Liked how [it] included participating and non-participating candidates. Just being able to see the bigger picture."

"I love more data but I do like that it isn't oversaturated with numbers, data points that aren't critical for someone who isn't a number cruncher and who is just trying to figure out more info about someone running for commissioner. The site does a great job not making it intimidating."

- They would like better website usability with figuring out where to look for certain information, general search, and comparison of candidates.

- They would also like more detailed information on contributor demographics, industries, etc., with the goals of making reporting more efficient, and helping the public understand how public election financing works.

- One additional request is to provide weekly communications to the press with updates on the program and candidates.

Program Recommendations

- Training on how to use OpenElectionsPortland.org for campaigns, organizational stakeholders, and media, so they can make the most use of it during elections.
- Improve the usability of the site through continued partnership with Hack Oregon/Civic Software Foundation.
- Provide additional information on contributor demographics, work industries, etc. for the most robust picture possible.