



## **Comment to New York State Public Campaign Finance Board on the Implementation of 2023-24 Program**

December 2, 2024

Thank you for requesting comment on the successful debut of the state public campaign finance program in the last election cycle. Reinvent Albany works for more transparent, accountable New York government and has been advocating for NYS public campaign finance since 2015. We are proud to have been one of the core group of advocates that helped shape this program and led to the creation of the Public Campaign Finance Board (PCFB).

We write today both with a request and with observations about the performance of the public match in the election.

First, our request. We strongly urge this board, the Governor, and the Legislature to [oppose structural changes](#) to the public campaign finance law that would:

1. Allow contributions of more than \$250 to be matched with public funds.
2. Increase the number of contributions a candidate must have to participate in the matching program.
3. Allow candidates to keep public matching funds if the surplus is more than the difference between the public matching funds received and the total qualified campaign expenditures.

How on earth can anyone argue that these cynical and destructive changes will help New York build a stronger, more inclusive democracy?

The public campaign finance law was established to amplify the voices of small donors in a state known for pay-to-play scandals connected to its high contribution limits. Allowing \$18,000 campaign contributions to be matched by the state is simply unethical and contrary to the basic purpose of the public matching program. New York's qualifying thresholds are already higher than most programs nationally. Finally, why allow candidates to treat public funds as if they are private profit? New York City requires campaigns to return all surplus matching funds. The city correctly understands that allowing candidates to keep these public funds fuels public cynicism and mistrust.

Second, our observations: While we're still awaiting the final data on contributions and expenditures in the 2023-2024 elections, early evidence suggests that the state's first election using public campaign finance was a major success. Our impression is that the Public Campaign Finance Board and staff performed extremely well and exceeded expectations.

Since the program is intended to reduce the influence of big money, the most important metric is whether or not candidates signed up. We were glad to see that the program had 329 candidates signed up by the May enrollment deadline. Though the program was previously criticized as only benefiting Democrats, [the data shows](#) great cross-partisan appeal: Of those enrolled, over 100 were Republicans and nearly 200 were Democrats, closely tracking the state's [party registration ratio](#). Back in 2019, many Republicans initially [attacked](#) the program as being "a \$100 million welfare program for [politicians'] campaigns." In 2024, many of them changed their tune, [praising](#) how the program gives small donors a greater voice and boosts candidates without deep pockets.

The program also emerged from a difficult media environment largely scandal-free. We've seen in NYC how a single corrupt official can lead to a tumult of negative, bad-faith statements about the city's program, despite the fact that [campaign finance violations happen in systems without public matching as well](#). This problem was bound to come up for the state system, but when it was revealed that one candidate had been using straw donors, the PCFB quickly acted to address the issue.

Reinvent Albany believes public campaign finance is one of the best ways to counteract unlimited independent expenditures and reduce the influence of deep-pocketed donors – including those that have business before the state. Lobbyists' contributions can't be matched under the program, though there is more work to do to limit contributions from those seeking other state business. The preliminary data on the 2024 election suggests that [large donors had more influence than ever](#) in national races. The NYS public campaign finance program is one of the most important ways states and cities are pushing back against this trend.

The program's continued success will depend on the PCFB and whether you are willing to use your full powers to issue fines to protect the system, and engage with the public to seek continuous improvement. The program's [enacting legislation](#) says that "New York's current system of campaign finance, with its large contributions to candidates for office and party committees, has created the potential for and the appearance of corruption." But the PCFB will be under considerable pressure to bend to the will of large donors and grouchy politicians. We urge you to be bold and fight to ensure that the program never deviates from its mission of empowering everyday New Yorkers.