



June 29, 2021

Chair Shana M. Broussard
Federal Election Commission
1050 First Street NE
Washington, DC 20463

Re: Issue One's comment in response to the Federal Election Commission's "REG 2021-01 Candidate Salaries" petition for rulemaking

Dear Chair Broussard:

Issue One respectfully submits this letter in response to the Commission's request for comments on a petition for rulemaking from Nabilah Islam to amend 11.C.F.R. § 113.1(g)(1)(i)(I) related to candidate salaries, including creating a salary floor and lengthening the available salary period, and to include health insurance costs as permissible expenses. Through this rulemaking, the Commission can help make it easier for working Americans to run for federal office, and the agency should take this opportunity to do so.

Big-money special interests shouldn't have the outsized influence that they currently have in Congress, so Issue One advocates for reforms that will make our democracy work better for everyone. We strongly believe that the ability for all Americans to run for office is vital for a healthy democracy, and that no one should be prevented from pursuing political office due to their financial circumstances.

We support amending the federal regulations to lengthen and standardize the salary period for candidates, to allow candidates with little to no income in the past year to collect a reasonable wage while running for federal office, and to include health insurance costs as permissible campaign expenses so that candidates can be on the same health care plan as their staff. These small changes can make a difference toward creating a more representative legislative body, though by no means will they fully solve the larger issues caused by the vast sums of money that flow through campaigns, including the fact that candidates with more money tend to win elections.

The odds are frequently stacked against candidates of modest means who attempt to run for federal office, and very few individuals of modest means currently serve in Congress. In fact, more than half of members of the 116th Congress were millionaires,¹ and at a time when the cost of winning congressional elections has soared, both Democrats and Republicans have frequently prioritized the recruitment of wealthy individuals who can self-fund a significant portion of their campaigns. According to internal research by Issue One, more than 20% of candidates who ran in competitive open seat U.S. House races from 2012 through 2020 personally bankrolled at least 10% of their campaign costs, with many of them investing \$500,000 or more into their races.

The current differences among states in the dates when candidates can begin to collect salaries create disparate effects on working-class candidates based on where they live. There is no reason that a U.S. House candidate in Missouri can collect a salary for 133 days before their primary election, while a U.S. House candidate in Pennsylvania can collect a salary for less than half that time, just 56 days.



This disparity has real consequences for candidates, who face grueling schedules² — juggling full-time jobs, families, and campaigning — while they wait to become eligible to collect salaries. Because of this, those with enough means to quit their jobs and campaign full-time have a distinct advantage over those that cannot afford to do so. The Commission should extend the salary period to at least 180 days before the primary election in every state to ensure that this gap is closed as much as possible and that candidates have enough time to campaign prior to their primary elections.

Additionally, candidates who earned little or no money during the past year — for reasons including caring for family members and gaps in employment — should not be excluded from collecting a salary from their campaign funds. The Commission should embrace a reasonable “salary floor” — the annualized salary of \$15 per hour (for 40 hours per week), indexed to inflation.

At the same time, the Commission should have a keen awareness that there is a risk of corruption when campaign funds are used for personal use. To safeguard against individuals running for federal office simply for material gain, candidates should not be permitted to collect a salary that constitutes a substantial portion of their total campaign funds.

Finally, the Commission should amend its rules to include health insurance costs for candidates as a permissible expense — allowing candidates to be a part of the same health care plans as their staff. Given that most Americans receive health care coverage through work,³ and that congressional candidates often forgo full-time work to campaign, being able to pay for health insurance through their campaigns could make a huge difference for many candidates.

We encourage the Commission to consider the above comments and recommendations and proceed with a rulemaking on these important regulations.

Respectfully submitted,

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¹ <https://www.opensecrets.org/news/2020/04/majority-of-lawmakers-millionaires/>

² <https://theintercept.com/2020/01/16/campaign-finance-law-wealthy-working-class-candidates/>

³ <https://www.census.gov/library/publications/2020/demo/p60-271.html>