

Campaign Treasurer Checklist

By Lisa Duncan and Lisa Hicks-Dumanske

Are you a candidate who is unsure if you need a campaign treasurer? Besides the ongoing chore of tracking contributions and expenditures, there are financial filings due 40 days and 12 days before the election. This is when you want to maximize your time connecting with voters, not chained to your desk filling out paperwork!

The amount of work for the treasurer will be driven by the size of your budget. If you plan to raise and spend less than \$2000, you will have very few financial forms to file and might not need a treasurer. If you plan to spend more than \$100,000 you might prefer to pay an accounting firm experienced in campaign finance management. But if you fall somewhere in the middle, you will greatly benefit from having a treasurer on your campaign team.

If you don't know your budget expectations, take a look at people who have run for that office in past years. You can search for past candidate financial filings through your county elections website or city clerk website, depending on the office. Also check if the office you are running for has voluntary campaign spending limits and decide if you want to adhere to those guidelines.

There are no formal qualifications for serving as a campaign treasurer. Someone good at financial record keeping and meeting deadlines can do the job well. This is a role for someone who has great attention to detail and sufficient free time in the busy weeks leading up to an election.

For a first time campaign treasurer, the following checklist can give you a preview of what to expect during an election cycle. The job requirements are well documented by the California Fair Political Practices Committee (fppc.ca.gov).

Reading for Treasurers

Familiarize yourself with the campaign finance rules that apply to candidates for the office:

- FPPC Campaign Rules (<http://www.fppc.ca.gov/learn/campaign-rules.html>) - see "Basic Rules for Treasurers"
- County of San Mateo Elections Office (smcacre.org) - search for "Campaign Finance Information" and "Candidate Guide"
- County of Santa Clara Registrar of Voters (sccgov.org) - search for "Candidate Guide"
- Search for city or board guidelines specific to the position, particularly spending and individual contribution limits

Financial filings

The legally required and external facing part of a treasurer's job is the official financial filings. Some are long and tedious, but there is a very helpful cloud-based tool called Netfile that makes the process much easier. Many candidates make avoidable mistakes on their forms because they aren't using Netfile so do get an account and training before you start your 460 filing. Netfile supports forms 410, 460, 470, and 497 and offers free training sessions to all committees (www.netfile.com/Content/CampaignTraining).

- ❑ Before you submit your first form, decide what address/phone/email you will use for all your filings because it will become part of the public record. Expect a fair amount of spam, but also contact from the press and sincere voters seeking information.
- ❑ Sign up for Netfile training.

Filing requirements:

- ❑ Note that form 501 (Candidate Intention Statement) is not a financial form, but it must be filed before raising or spending money.
- ❑ For candidates planning to raise or spend less than \$2000, you only need to file form 501 and form 470. The rest of this article is for campaign budgets greater than \$2000.
- ❑ Form 410 (Statement of Organization, \$50 fee) must be filed as soon as you reach \$2000 in contributions or loans, but you'll want to do it sooner because it will start the process to generate your FPPC number, which you will need for fundraising and you will want to put it on your website, business cards, mailers, etc.
- ❑ Form 460 (Consolidated Campaign Disclosure Form) is a form you will file multiple times. As long as your campaign committee is active, this will be filed bi-annually plus two additional filings in the weeks leading up to the election. It requires detailed information about every contribution and expenditure.
- ❑ In the 90 days leading up to election day, you must file form 497 within 24 hours of receiving a donation of \$1000 or more. You will need a system for daily monitoring of incoming checks and credit card contributions during this 90 day period.

Systems set-up

All of your campaign financial transactions will go through a **Candidate Controlled Committee** that you create and manage. It is tracked by the state with an ID number that the FPPC will assign to you. Filing form 410 will initiate the process to get your ID number. With the exception of the form 410 \$50 filing fee, do not make expenditures or fundraise until you have your FPPC ID number. Note that it can take two weeks or more to get your ID number from the state.

Banking:

- ❑ Decide on your Candidate Controlled Committee name (see the FPPC guidelines for naming requirements). This will be the name on your bank account and will appear on your campaign literature.
- ❑ Optional: If you are in a hurry to get your FPPC ID number, file form 410 now, before you have a bank account number. You will amend the form later.

- Apply for an EIN (form SS4). Using an EIN allows you to NOT use your personal social security number for your campaign account. Make sure the bank understands this is not a personal account.
- Open a bank account with a loan or donation from the candidate or a supporter. If this is a loan, write "loan" on the check and keep a copy.
- File (or amend) form 410 with your bank account number. If you have less than \$2000 in the account, your status will be "not yet qualified."
- File an amendment to form 410 within 10 days of raising \$2000 (combined contributions and loans) with your "date qualified as a committee."

Accounting:

- Set up a recordkeeping system for contributions and expenditures.
- Record contributors' names and addresses, plus profession/employer if they donate \$100 or more.
- Record all expenditures and store receipts. Each expenditure will require a form 460 payment category code. If you are in doubt about how to use the codes, call the FPPC Help Line.
- Read the rules on "in kind" contributions and record those.
- Create a storage strategy, either physical or online, for all receipts, invoices and loan documentation.
- Create secure passwords and make a plan to backup your data regularly.

Contributions:

- Choose a payment processor for credit card contributions (choices may be limited by your website host) and link payments to your bank account.
- Set up a donation button on the web site that is linked to your payment processor.
- Create a remit envelope to collect all the information you legally need along with each contribution.
- Decide who will gather contributions by check and make the deposits.

During the campaign

- Keep up with your contribution and expenditure record keeping.
- Recruit an assistant treasurer to help you enter data and review forms.
- Mark your calendar with the form 460 due dates.
- Review your opponents' 460 forms to understand where they are spending money.
- Tip from a treasurer who likes to minimize work: Payments by check or debit card directly from the Candidate Controlled Committee bank account require less paperwork than payments by credit card.

Post-election

After the election there will be final bills to pay and loans to repay. If you are in debt you can continue fundraising. Don't be too hasty closing your account. For instance, in the 2020

election, San Mateo county assessed an additional voter guide candidate statement fee six weeks after election day.

Once all debts have been paid, the candidate can decide if she will close the bank account or transfer funds to a new account for a future campaign. As long as the bank account is open, the committee will pay an annual \$50 fee to the secretary of state and file form 460 twice a year. If the committee is to be terminated you will file forms 410 and 460.

The FPPC requires campaign committees to keep all records, including original source documentation, such as bank statements and other records reflecting account activity, for a period of four years from the date the campaign statement relating to the records was filed.

Conclusion

A good treasurer is a great asset to a campaign. She frees the candidate to focus on campaigning. She painstakingly meets FPPC reporting requirements so opponents can't accuse the candidate of being fiscally irresponsible. A treasurer's understanding of financial filings can also be leveraged to research how the opponent is spending money.

If you are new to being a campaign treasurer, you don't have to feel alone. Besides all the state and local documentation, there are very nice people at your city clerk and county elections office who sincerely want to help you succeed. And the FPPC provides a telephone advice line staffed with incredibly patient people who will answer your questions as you navigate the process.

Money management is an essential part of every campaign and the treasurer makes the process so much easier.