

INSIGHT

A Better Balance for Campaign Finance Disclosure

FEC Reforms to Improve Transparency

By Ian Vandewalker JUNE 2026

Transparency about the sources of election funding is a pillar of campaign finance regulation. The disclosure rules in place today were mostly crafted in the aftermath of Watergate.¹ Since 1980, candidates, parties, and other political committees have been required to report identifying information, including name and address, for every person who gives more than \$200 in an election cycle. The Federal Election Commission (FEC) collects and publishes this information on its website. But the system provides too much information about some donors while leaving others completely hidden. Change is long overdue. This policy brief outlines reforms to improve federal campaign finance disclosure rules.

Public disclosure of campaign finance data has clear benefits to democracy: It helps fight corruption, and it provides voters useful information. Knowing who supports a politician helps voters predict what that candidate is likely to do in office. Transparency is especially important today because courts have struck down reasonable campaign finance regulations, like limits on independent expenditures, leading to an explosion in spending by super PACs

and dark money organizations. These independent groups spent more than \$4 billion on the 2024 election cycle, much of it coming from megadonors and wealthy special interests.² Since the election, President Donald Trump has raised an unprecedented amount of contributions from wealthy supporters, many of whom have sought favors from his administration, including policy concessions, high-level government jobs, and even presidential pardons.³ With so much big money influencing elections, it's crucial that Americans at least know where it is coming from.

The campaign disclosure regime is riddled with loopholes. Since the Supreme Court decided *Citizens United v. FEC* in 2010, dark money from groups that don't reveal their donors has swelled. It reached a high of \$1.9 billion in the 2024 cycle, nearly doubling the record from four years prior.⁴ And recent technological and cultural changes have led to a seismic shift in how people communicate. Election campaigns are increasingly conducted online in a media ecosystem that was unimaginable in 1980. Disclosure laws designed for the mass media of the 20th century have simply not kept up.

At the same time, there is increased risk that broad donor disclosure will have unintended consequences. The FEC is publishing personal information on more people than ever before. The internet has made it easier to access information about specific individuals. Political harassment and violence are on the rise. Together, these developments pose risks for individual privacy and safety.

Congress should enact commonsense solutions to ensure that the campaign finance system achieves the key benefits of disclosure without needless privacy risks that could discourage Americans' political participation. Reforming the system should include the following:

- eliminating dark money spending by requiring all groups that spend on elections to disclose their large donors
- requiring disclosure of online political spending, including payments to influencers
- limiting public information about donors to name, state, city, zip code, occupation, and employer, leaving out street address
- raising the dollar threshold for donors to be identified in public data to \$800 or more and indexing it to inflation
- making data that includes street addresses and information about small donors available for research under restrictions that prevent users from publishing any identifiable information

Disclosure reform should be part of a broader agenda for combating political corruption, which would include restoring campaign finance limits, banning political contributions from government contractors, and creating a more effective ethics watchdog.⁵ Together, these solutions would help restore Americans' trust in the U.S. government.

The Benefits of Campaign Disclosure

Transparency about the sources of campaign funding offers several benefits to democracy, as the Supreme Court has long recognized.⁶ It also enables research for academic and policymaking purposes.

Disclosure of funding sources can fight corruption by allowing the public to follow the money and illuminating illegal and scandalous behavior such as taking a bribe, which is typically done in secret. As future Supreme Court Justice Louis Brandeis wrote in 1914, "Sunlight is said to be the best of disinfectants."⁷

Public disclosure aids the enforcement of other campaign finance laws by allowing watchdogs to examine

data for illegal transactions, such as donations that exceed the contribution limit or come from a prohibited donor such as a corporation or foreign entity. With hundreds of thousands of transactions in a two-year election cycle, the FEC is not able to find every violation; journalists, civil society, and the public can help sift through the data.

Transparency is also crucial for voters to be informed about people running for office. Candidates' financial support demonstrates what they stand for, whom they agree with, and what they will do when in office.⁸ Someone who takes large amounts of money from a special interest group is likely to make policy that will favor that group. Disclaimers on ads that reveal who paid for the ad also help audiences decide whether the speaker is trustworthy or biased. As the Supreme Court put it in *Citizens United*, "transparency enables the electorate to make informed decisions and give proper weight to different speakers and messages."⁹

Public disclosure also creates data that reveals how money flows in elections. Political scientists and others use this data to shed light on the ways the campaign finance system benefits or harms democratic values. This provides evidence to inform policies and improve the campaign finance system.

Recommendations

>> Eliminate dark money.

Congress must address the expanding problem of dark money, or spending on elections by organizations that do not disclose the identities of their donors, which reached a new high of \$1.9 billion in 2024.¹⁰

Congress should enact the Disclose Act, legislation that would require all organizations that spend on elections to report their donors, effectively eliminating dark money.¹¹ The bill would require any organization spending \$10,000 or more on certain campaign-related activities to disclose donors who gave at least \$10,000 to fund those activities. Safeguards in the legislation would allow nonprofits to continue to fund activities outside the campaign finance context, like lobbying, without disclosing the donors who fund those other functions. And there is an exception for cases in which a donor is subject to "serious threats, harassment, or reprisals."¹²

>> Require transparency for online campaign spending.

Updates to the rules governing transparency of online election spending are long overdue. Analysis of data voluntarily published by the biggest online platforms (Meta, Google, Snap, and X) shows that online political campaign spending totaled \$1.9 billion in the 2024 election cycle,

and this total is almost certainly an underestimate.¹³ For one thing, it does not include payments to influencers to share content or create new content promoting a candidate. The influencer advertising sector is worth \$250 billion and growing.¹⁴ Political committees have taken note, with some spending millions of dollars on influencers.¹⁵ Their reliance on this sector is only going to continue to expand.

Federal campaign finance disclosure rules fail to account for most online spending. The only online political ads whose costs must be disclosed are those that are made by FEC-registered committees, those containing “express advocacy” using specific words telling viewers how to vote, or those that solicit a campaign contribution. This leaves out ubiquitous sham issue ads, in which outside groups criticize or praise candidates just before elections without mentioning voting, to say nothing of paid influencers and other, newer forms of paid political advocacy.

In 2002, Congress enacted the McCain–Feingold campaign finance reform package, which required disclosure for issue ads that mention candidates in the run-up to an election, deeming them “electioneering communications.” But the rules apply only to forms of mass media that were dominant at the time, like television and radio, leaving out the internet entirely.¹⁶ At a minimum, Congress should extend disclosure requirements for “electioneering communications” to include online ads. Congress should update the law to require disclosure of ad spending on today’s full media ecosystem, including social media, gaming, and streaming video platforms. A bipartisan bill, the Honest Ads Act, would do just that, in addition to requiring more transparency from large, online ad-selling platforms themselves about the ads they host.¹⁷

Reforms must also shed light on payments to influencers. Current law does not require influencers’ political content to include disclaimers informing audiences who paid for it. The need for in-ad disclaimers is even more pressing for influencer content than it is for traditional advertising. Unlike traditional ads, which are typically easy for audiences to identify as paid ads, influencer content may appear to be spontaneous and organic. Viewers may not even know they are seeing paid content or promotion, let alone be aware of who paid for it. Disclosure laws should, therefore, cover paid promotion by influencers, which would be accomplished by the Disclose Act of 2026.¹⁸

>> Stop requiring the publication of donors’ street addresses.

To balance the benefits of transparency with privacy, the law should omit street addresses from public information about donors. Current federal law generates a public record of identifying information about tens of millions of individuals who give amounts of all sizes to candidates, parties, and other political committees. The law requires commit-

tees to disclose the name, mailing address, occupation, and employer of any individual donor who gives more than \$200 to a committee over the course of an election cycle.¹⁹ The FEC publishes these disclosures on its website. Committees are allowed to report donations below \$200 as a single, bulk total of “unitemized” funding.

Of course, public disclosure of donors’ addresses has its benefits. Because multiple people can share the same name, addresses can be used to identify donors and to perform other watchdog functions. This is useful, for example, to track whether an individual who gave multiple times exceeded the contribution limit. Addresses also provide contact information for further investigation. And they allow the collection of geographic data about where candidates’ support comes from, including whether donations are from constituents in a candidate’s state or congressional district.

But publishing donors’ street addresses also creates privacy concerns. The law requires donors to give a mailing address, as opposed to a home address. But since most people receive mail only at their home address, disclosure of their mailing address allows someone to find their home. Unlike in the 1970s, the quick accessibility of information online and information collection by data brokers mean that anyone can search information on millions of donors and potentially find someone’s home address.

At the same time, politically motivated violence is on the rise.²⁰ Attacks on high-profile political figures in recent years include the shooting of Donald Trump, the hammer attack on the husband of former House Speaker Nancy Pelosi, and the assassinations of the conservative activist Charlie Kirk in Utah and two Democratic state lawmakers in Minnesota. In addition, far less prominent individuals have been targeted over politics. Half of all officeholders at the city or county level have experienced abusive behavior like threats, harassment, or stalking.²¹

The availability of addresses on the internet also poses risks for individuals who do not hold public office. After California published information in 2008 about donors to Proposition 8, the initiative to ban same-sex marriage in the state, some donors allegedly received death threats and other forms of harassment.²² To be sure, not every potential consequence of disclosure is a concern. Mere disagreement with and criticism of one’s political activities are not harms that outweigh the benefits of campaign finance transparency. But serious harms like doxing and threats of physical violence are legitimate concerns. Intimate partner violence or stalking, too, can be facilitated by publicly available address databases.²³ Swatting, or maliciously sending police to someone’s house, has also become all too common.²⁴

Currently, the FEC redacts donor information when a donor can show “a reasonable probability [of] threats, harassment, or reprisals.”²⁵ Donors can seek redaction through a lawsuit, a request for advisory opinion, or an ad

hoc informal request.²⁶ This option does not fully address privacy concerns, however. Some of the tens of millions of people who donate to political campaigns may not know they are at risk until bad actors already have their address. They may not know about, or have the resources to engage with, the FEC processes to request redaction. It is better to set the default disclosure policy in a way that mitigates risk, rather than put the onus on each donor to opt out.

The privacy risks associated with public disclosure of campaign donations would be drastically reduced by withholding street addresses, as the FEC has recommended to Congress.²⁷ Public data should include only a donor's city, state, and zip code as well as occupation and employer.

Committees should still report full addresses to the FEC, which uses the information for enforcement purposes. The FEC can redact street addresses before publishing transaction data.

Even without street addresses, information about donors' city, state, and zip code will allow the public and the press to glean some information about the geographic sources of support for candidates and other committees. Data on a donor's occupation and employer will provide information about support from industries and special interests.

>> Raise the dollar threshold for public donor disclosure.

The most important donors to include in public information are those who give large amounts. Large donors are the ones who pose significant corruption risks and whose influence is of the greatest interest to voters. So public disclosure should focus on them.²⁸

Decades of inflation have slashed the real value of the threshold for itemized disclosure since Congress set it at \$200 in 1980.²⁹ In 2026 dollars, that would be worth more than \$800.

Moreover, the majority of today's contributions are made through transaction-processing organizations like ActBlue and WinRed.³⁰ Federal law treats these groups as "conduits" and requires them to disclose individual donor information for every transaction, no matter how small.³¹ As a result, FEC data includes millions of records of donations of a just few dollars — or even a few cents — each.

Simply updating the \$200 threshold for inflation since 1980 would require quadrupling it. A new public disclosure threshold should be set between \$800 and \$1,000 and then regularly updated for inflation, as contribution limits are under current law.³² The same threshold should apply to contributions that come through conduits, rather than the current requirement to publish all conduit transactions.³³

Raising the itemization threshold would substantially swell the amount of campaign funding that is unitemized and reported only as part of a bulk total. This could potentially increase opportunities for donors to circumvent contribution limits. For that reason, it is important that

the FEC be able to determine the aggregate total amount an individual donor gives over the course of an election cycle, including transactions completed before the donor crossed the itemization threshold. For example, with a \$1,000 disclosure threshold, if a donor gives \$900, the transaction will not be itemized. If that donor later gives the same committee \$3,000, their aggregate giving will violate the current \$3,500 contribution limit. To guard against this possibility and other potential violations, the FEC should be able to access information about transactions below the itemization threshold.

To accomplish this, committees should still disclose individual donations of lower amounts in nonpublic information provided to the FEC for enforcement purposes.³⁴ This nonpublic disclosure could retain the \$200 itemization threshold. Alternatively, for nonpublic reports, the itemization threshold could be eliminated altogether. Because campaigns must track all donors in order to check for repeat donations that might cross either the itemization threshold or the limit on contributions, disclosing all donor information to the FEC would not impose a substantially greater compliance burden. Committees typically accomplish donor tracking with software that can be used to create reports of donations at any giving level.

>> Provide limited access to full data.

Information about both street addresses and small donations is valuable to academic and policy research. Eliminating these aspects of public disclosure would threaten to make certain empirical research on campaign finance difficult or impossible. Therefore, the law should allow restricted access to full data.

Omitting donors' street addresses from public disclosure data would make donors harder to accurately count and identify. It's common for different individuals to have the same name, even within a small geographic area. Without addresses, it would be impossible to definitively tell whether multiple transactions with the same name were from one person giving repeatedly or from more than one donor. It would also be impossible to know for certain whether a donation appearing in the data was made by a public figure, like a politician or prominent business owner, rather than someone else with the same name.

And because congressional district boundaries don't follow zip code boundaries, omitting street addresses would often make it impossible to tell whether a donation came from a constituent. It also would prevent the analysis of trends in in-district giving versus national giving.³⁵

Moreover, eliminating public access to data about small donations would impoverish research. Small money, or donations that fall below the current \$200 disclosure threshold, accounts for a substantial portion of campaign funding; in the 2020 election cycle, for instance, it accounted

for 30 percent of money raised by candidates.³⁶ And the more than 14 million small donors greatly outnumbered the less than 6 million larger donors in the 2020 election.³⁷

Because small donations can differ systematically from those of greater amounts, eliminating public data on small money would distort researchers' understanding of the campaign finance system.³⁸ Data about small donors is relevant for evaluating the health of the U.S. campaign finance system and democracy, as well as for crafting policy reforms. Among many studies along these lines, researchers have examined

- the demographics of small donors, which are relevant to questions about diversity and representation in the campaign finance system and its influence on politics;³⁹
- small donors' ideological characteristics and motivations for giving, which can be relevant to questions around how fundraising incentives for elected officials affect governance in an era of polarization and political dysfunction;⁴⁰ and
- whether small or large donors are driving increases in out-of-state and out-of-district money in recent decades, which is relevant to concerns about constituent representation and the nationalization of politics.⁴¹

To ensure that academic study and policy debate are based on the most accurate data possible, the FEC should provide limited access to datasets that include street addresses and itemized donor information below the increased public disclosure threshold. Access to the data should require a certification that the user will not make any personally identifiable information public or use it for any unlawful purpose. Data use agreements can also restrict the ways researchers collect, store, use, and dispose of data, including by imposing a duty to report breaches.⁴²



The country's broken campaign finance system is harming Americans' trust in government.⁴³ Roughly 73 percent say that government corruption is a critical threat to the United States.⁴⁴ Transparency about the sources of political spending is a key tool in the fight against corruption. Although misguided court decisions have stripped away reasonable regulations, the Supreme Court has consistently blessed disclosure in campaign finance. With the changes described here, Congress can enable the U.S. campaign finance disclosure system to accomplish what it was designed to do, such as helping root out corruption and informing voters' choices, without unnecessary privacy risks.

Endnotes

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