STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
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**To:** Chair Silver and Commissioners Brandt, Lloyd, Ortiz, and Wilson

**From:** Dave Bainbridge, General Counsel
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**Subject:** Cost-of-Living Adjustment ("COLA") to Contribution Limits, Voluntary Expenditure Ceilings and Gift Limit

**Date:** November 19, 2026

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## Executive Summary

Staff recommends amending Regulations 18545, 18700, 18730, and 18940.2 to make biennial cost of living adjustments (COLA) to regulations establishing applicable contribution limits, voluntary expenditure ceilings, state officeholder contributions, and the gift limit for January 1, 2027, through December 31, 2028, as required by the Political Reform Act[1] (Act).

## Reason for Proposed Regulatory Action

Government Code Sections 83124, 85301(d)(1), 85316(b)(4), and 89503(f), charge the Commission with making COLA adjustments to reflect changes in the Consumer Price Index ("CPI"), in January of every odd-numbered year, to the following statutory limits:

- Contribution limits (Sections 85301, 85302, and 85303),
- Voluntary expenditure ceiling amounts (Section 85400);
- State officeholder contribution limits (Section 85316(b)); and
- Gift limits (Section 89503).

Adjusted limits for contributions, voluntary expenditure ceilings, and state officeholder contributions are specified in Regulation 18545. The adjusted gift limit is specified in 18940.2 and referenced in Regulations 18700 and 18730, and 18940.2. Accordingly, these regulations will be amended to reflect the amounts that will take effect on January 1, 2027.

## Background/Proposed Amendments

Section 82001 defines the COLA adjustment as follows:

"Adjusting an amount for cost-of-living changes" means adjusting the

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[1] The Political Reform Act is contained in Government Code Sections 81000 through 91014. All further statutory references are to the Government Code. The regulations of the Fair Political Practices Commission are contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

amount received the previous year by an amount determined at the beginning of each fiscal year by the Director of Finance corresponding to amounts authorized from the salary and price increase items as set forth in the Budget Act and other cost-of-living adjustments on the same basis as those applied routinely to other state agencies.

I. *Contribution, Voluntary Expenditure Ceiling, State Officeholder Contribution Limit Adjustment.*

Limits for contributions and voluntary expenditures were initially added under the "Campaign Contributions and Spending Limits Act of 2000," approved by voters as Proposition 34. Section 85301 limits contributions from persons; Section 85302 limits contributions from small contributor committees; Section 85303 limits contributions to committees and political parties; and Section 85400 sets voluntary expenditure ceilings. Added in 2006, Section 85316(b), allowed the establishment of a separate officeholder account for officeholder expenses subject to calendar year contribution limits, to be given a COLA adjustment in odd-numbered years to reflect changes in the CPI.

Regulation 18544 sets forth three formulas used to make the COLA adjustments to the contribution, voluntary expenditure ceiling, and state officeholder contribution limits found in Sections 85301, 85302, 85303, 85400, and 85316(b), respectively. Each formula multiplies the initial limit (according to the year each limitation was enacted) by the quotient of the updated annual CPI divided by the base annual CPI (for the enactment year). Equations for each formula are provided below.

Regulation 18544(c) specifies the source for the CPI figure as follows:

> The adjustments shall be based upon the Department of Finance Consumer Price Index Forecast, May Revise, annual California Consumer Price Index for All Urban Consumers, for the calendar year immediately preceding the year in which the adjustment is to take effect.

Under this regulation, the Commission's adjustment uses the CPI figure obtained from the California Department of Finance ("DOF"), which bases its CPI calculations on the Bureau of Labor Statistics figures. The DOF Consumer Price Index Forecast, May Revise (prepared April 2026) states that the applicable forecast annual 2026 California CPI is "367.280."[2]

Regulation 18545 states the current per-year contribution limits, voluntary expenditure ceiling amounts, and state officeholder contribution limits.

A. Contribution Limits

For purposes of contribution limits, Regulation 18544(a)(1) states:

[2] A forecast annual CPI is used due to the fact that the actual CPI for a given year is not available until mid-January of the following year. See https://dof.ca.gov/forecasting/economics/economic-u-s-and-california/ CPI-U all items for 2026, for the relevant CPI figure.

The contribution limitations in Government Code Sections 85301, 85302 and 85303 shall be adjusted biennially by the Commission to reflect changes in the California Consumer Price Index (CPI). The adjustments shall be made using the following formula: the contribution limit amount in effect January 1, 2001, multiplied by the annual CPI, divided by the base CPI from 2000, rounded to the nearest one hundred dollars ($100). (*fn.omitted.*) The resulting figure shall be the adjusted contribution limitation in effect for all state elections held until the next odd numbered year.

The above language is expressed as the following equation:

Applicable Limit 2001 X [367.280 (2026 Annual CPI*) / 174.8 (2000 CPI)] =

2027 Limit**

* As forecast in the DOF Consumer Price Index Forecast, May Revise, prepared April 2026.
** Rounded to the nearest $100 for contribution limits.

Additionally, under Section 85301(d)(1), which took effect January 1, 2021:

[A] person shall not make to a candidate for elective county or city office, and a candidate for elective county or city office shall not accept from a person, a contribution totaling more than the amount set forth in subdivision (a) per election, as that amount is adjusted by the Commission pursuant to Section 83124. This subdivision does not apply in a jurisdiction in which the county or city imposes a limit on contributions pursuant to Section 85702.5.

Accordingly, local candidates not subject to county or city imposed contribution limits, are now subject to the same contribution limit determined under Regulation 18544(a), and the above formula, for a candidate for state elective office under Section 85301(a).

B. Voluntary Expenditure Ceilings

Regulation 18544(a)(2) states:

The voluntary expenditure ceilings in Government Code Section 85400 shall be adjusted biennially by the Commission to reflect changes in the California Consumer Price Index. The adjustment shall be made using the following formula: the voluntary expenditure ceiling amount in effect January 1, 2001, multiplied by the annual CPI, divided by the base CPI from 2000, rounded to the nearest one thousand dollars ($1,000). (*fn. omitted.*) The resulting figure shall be the adjusted voluntary expenditure limitation in effect for all state elections held until the next odd numbered year.

The above language is expressed as the following equation:

Applicable Limit 2001 X [367.280 (2026 Annual CPI*) / 174.8 (2000 CPI)] =

2027 Limit**

* As forecast in the DOF Consumer Price Index Forecast, May Revise, prepared April 2026.
** Rounded to the nearest $1,000 for voluntary expenditure ceiling amounts.

C. State Officeholder Contribution Limits

Regulation 18544(b) states:

For purposes of Government Code Section 85316(b), beginning the year 2006 the cost of living adjustment shall be calculated as follows.

(1) The contribution limitation shall be adjusted biennially by the Commission to reflect changes in the California Consumer Price Index (CPI). The adjustment shall be made using the following formula: the contribution limit amount in effect January 1, 2007, multiplied by the annual CPI, divided by the base CPI from 2006, rounded to the nearest one hundred dollars ($100). The resulting figure shall be the adjusted contribution limitation in effect for all state officeholders until the next odd numbered year.

The above language is expressed as the following equation:

Applicable Limit 2007 X [267.280 (2026 Annual CPI*) / 210.5 (2006 CPI)] =

2027 Limit**

* As forecast in the DOF Consumer Price Index Forecast, May Revise, prepared April 2026.
** Rounded to the nearest $100 for state officeholder contributions.

II. *Contribution, Voluntary Expenditure Ceiling, State Officeholder Contribution Limit Adjustment: Proposed Regulation 18545.*

Regulation 18545 states the current per year contribution limits, voluntary expenditure ceiling amounts, state officeholder contribution limits. Proposed Regulation 18545 amends these limits and amounts to reflect the required cost of living adjusted limits for calendar years 2027 to 2028. Proposed language also updates the applicable time periods. Using the above formulas and CPI figure, the COLA adjusted amounts are summarized in the following tables:

| **Campaign Contribution Limits** | **2001 Limit** | **Existing Limit** | **Adjusted Limit 2027-2028** |
|---|---|---|---|
| Assembly, Senate, CalPERS/CALSTRS | $3,000 | $5,900 | $6,300 |
| Statewide, Other than Governor | $5,000 | $9,800 | $10,500 |
| Governor | $20,000 | $39,200 | $42,000 |

| **Small Contributor Committee Limits** (Defined in Section 85203) | **2001 Limit** | **Existing Limit** | **Adjusted Limit 2027-2028** |
|---|---|---|---|
| Assembly, Senate, CalPERS/CALSTRS | $6,000 | $11,800 | $12,600 |
| Statewide, Other than Governor | $10,000 | $19,600 | $21,000 |
| Governor | $20,000 | $39,200 | $42,000 |
| PAC for State Candidates Section 85303(a) | $5,000 | $9,800 | $10,500 |
| Political Party Committees for State Candidates Section 85303(b) | $25,000 | $49,000 | $52,500 |
| Elective City or County Office Section 85301(d) | $3,000 | $5,900 | $6,300 |

| Voluntary Expenditure Ceilings | 2001 Limit | Existing Limit | Adjusted Limit 2027-2028 |
|---|---|---|---|
| Assembly, Primary | $400,000 | $784,000 | $840,000 |
| Assembly, General | $700,000 | $1,373,000 | $1,471,000 |
| Senate, Primary | $600,000 | $1,177,000 | $1,261,000 |
| Senate, General | $900,000 | $1,765,000 | $1,891,000 |
| Board of Equalization, Primary | $1,000,000 | $1,961,000 | $2,101,000 |
| Board of Equalization, General | $1,500,000 | $2,942,000 | $3,152,000 |
| Other Statewide, Primary | $4,000,000 | $7,844,000 | $8,405,000 |
| Other Statewide, General | $6,000,000 | $11,767,000 | $12,607,000 |
| Governor, Primary | $6,000,000 | $11,767,000 | $12,607,000 |
| Governor, General | $10,000,000 | $19,611,000 | $21,011,000 |

| Officeholder Account Contribution Limits | 2007 Limit | Existing Limit | Adjusted Limit 2027-2028 |
|---|---|---|---|
| Assembly, Senate | $3,000 | $4,900 | $5,200 |
| Statewide, Other than Governor | $5,000 | $8,100 | $8,700 |
| Governor | $20,000 | $32,600 | $34,900 |

| **Aggregate Officeholder Contribution Limits** (Total amount of contributions allowed from all sources per Section 85316(b).) | 2007 Limit | Existing Limit | Adjusted Limit 2027-2028 |
|---|---|---|---|
| Assembly, Senate | $50,000 | $81,400 | $87,200 |
| Statewide, other than Governor | $100,000 | $162,900 | $174,500 |
| Governor | $200,000 | $325,700 | $349,000 |

III. *Gift Limit Adjustment.*

Section 89503 was enacted in 1990 and established a gift limit for specified public officials. Section 89503(f) charges the Commission with adjusting the gift limitation, and states:

Beginning on January 1, 1993, the Commission shall adjust the gift limitation in this section on January 1 of each odd-numbered year to reflect changes in the Consumer Price Index, rounded to the nearest ten dollars ($10).

Regulation 18940.2(a) states the gift limit amount and the applicable time period, and currently provides:

> For purposes of Section 89503, the adjusted annual gift limit amount in effect for the period January 1, 2025, to December 31, 2026, is $630.

Regulations 18700 and 18730 also reference the applicable gift limit.

The following formula is used to calculate the adjusted gift limit:

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|---|
| Applicable Limit 1990 ($250) X [367.280 (2026 Annual CPI*) / 135 (1990 CPI)]<br>=<br><br>2027 Limit**<br><br>* As forecast in the DOF Consumer Price Index Forecast, May Revise, prepared April 2026.<br>** Rounded to the nearest $10 for gift limit. |

IV. *Gift Limit Adjustment: Proposed Regulations 18700, 18730, and 18940.2.*

Using the above formula and the Department of Finance's 2026 estimated CPI figure, the gift limit for January 1, 2027, through December 31, 2028, will be $680. This is an increase of $50 from the prior two-year period. Proposed Regulations 18700, 18730, and 18940.2 reflect the adjusted gift limit with approval of this item.

**Education/Outreach Efforts**

Amended contribution limits, voluntary expenditure ceilings, state officeholder contribution limits, and the gift limit will be featured on the Commission's website. Additionally, Commission staff will distribute the regulations to interested parties by means of the "Newly Adopted, Amended or Repealed Regulations" email list, and update the "Newly Adopted, Amended or Repealed Regulations" page on the website. Staff will also revise applicable educational materials and Commission forms.

**Conclusion**

The biennial cost of living adjustments to contributions limits, voluntary expenditure ceilings, state officeholder contribution limits, and the gift limit are mandated by law and effective January 1, 2027. The proposed regulatory amendments reflect those updated limits

**Attachments:**

- Proposed Regulation 18545
- Proposed Regulation 18700
- Proposed Regulation 18730
- Proposed Regulation 18940.2