

## Questions and Answers

### APA Petition to Phase Out Mini Reporting By 2032

On Thursday, January 22, 2026, the Commission will consider a proposal to phase out mini reporting over a period of 6 years. This document is intended to answer some of the questions that I anticipate will be asked during the discussion. – Conner Edwards

#### **1) Why should the PDC phase out the mini reporting option for campaigns?**

There are six main arguments for why mini reporting should be phased out, which are summarized below.

##### **a) Mini Reporting Reduces Transparency.**

In 2025, approximately 45% of campaigns filed as mini reporting. For these campaigns, voters are not able to go to the agency's website and view contributions received and expenditures made. A voter's only option would be to request an inspection of a specific campaign's books of account.

Book inspections can only occur within 10 days of the election, which in our vote-by-mail system is too late for the results of the inspection to have any impact on the outcome of the election. Second, this is a highly adversarial process<sup>1</sup> and not one that an average, reasonable voter would feel comfortable engaging in. Finally, these requests are often ignored by the recipient campaign, with no penalties imposed by the PDC.

##### **b) Mini Reporting Creates an Uneven Playing Field.**

Candidates who select the full reporting option must comply with a rigorous schedule of disclosures. Compliance with this schedule often requires a considerable expenditure of time, energy, and money on tasks (such as filing reports) which do not directly translate to electoral success.

In contrast, candidates who select the mini reporting option do not have to file any contribution or expenditure reports and thus are free to divert their time, energy, and money towards tasks which result in electoral success (like doorbelling, sending out

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<sup>1</sup> For an extreme example of this, consider the circumstances of PDC Case No. 39112, where a committee treasurer was surprised by a group of men who showed up armed with firearms during a scheduled book inspection. <https://enforcement-case-tracking.s3.us-west-2.amazonaws.com/46/39112%20Clark%20Leadership%20Response.pdf>

mail pieces, etc.) This creates an uneven playing field which advantages mini reporters.

**c) Unknown Compliance w/ Mini Reporting Requirements.**

By choosing the mini option, filers are required to raise and spend no more than \$7000 and collect no more than \$500 from any one contributor. The agency has no system (such as routine audits, for example) to verify that campaigns are actually complying with these requirements. Some campaigns incorrectly assume that personal contributions from the candidate are not subject to the \$7000 limit.

**d) PDC Software Improvements Have Removed Need for Mini Reporting.**

One of the biggest rationales for the mini reporting option has been to offer small, unsophisticated campaigns an alternative that does not require being tech-savvy to run for office. This was especially necessary because older versions of the PDC's Online Reporting of Campaign Activity (ORCA) system were highly non-intuitive, buggy, and could only be run on certain computer systems.

Since 2021, the agency has made significant progress towards making it easier for campaigns to file contribution and expenditure reports. These software improvements (coupled with explanatory training videos on the agency's website) have gone a long way towards "idiot-proofing" the filing process.

**e) Mini Reporting Rules Confuse Filers, Cause Compliance Issues.**

While the rules governing mini reporting seem obvious in application to those who have a deep understanding of campaign finance law, the requirements can easily trip up candidates who make a good faith effort to comply.

The most common way this manifests itself is when campaigns find that they need to exceed the \$7000 limit in order to be competitive in their race. This process to transition from mini to full reporting can take up to a month and often requires a significant expenditure of time/energy from both the candidate and PDC staff in order for the transition to occur.

**f) Mini Reporting Wastes Significant PDC Staff Resources.**

As described by staff at the December Regular Meeting, the process for mini reporters to switch to full reporting diverts a significant amount of staff time away from other essential agency tasks.

**2) Why wait until 2032 to phase out mini reporting?**

While I would personally prefer that mini reporting be eliminated immediately, the intent of waiting six years to phase out the mini reporting option is to give the agency (and filers) time to prepare for the transition.

During the next 6 years, the agency can continue to make improvements to the filing software to make it even more friendly for non-sophisticated users to file the required reports.

Additionally, because no filers have yet filed for 2032 election cycle, approving this change now would avoid the prospect of having candidates who have already filed under the mini reporting option argue that they have a “vested” right to avoid full reporting.

**3) Wouldn't this proposal discourage unsophisticated/non-tech savvy candidates from seeking local office?**

Not necessarily. The PDC could address this problem during the next 6 years by continuing to make incremental user-friendly improvements to the agency's software.

For instance, many of the most technologically challenged candidates have virtually no campaign activity beyond the payment of a filing fee and a statement in the voter guide. The PDC could easily devise a system whereby such candidates would receive an e-mail before a C4 deadline where it asks the candidates to click on a hyperlink if they had no contributions or expenditures to report. The candidate could then certify a pre-prepared blank report, fulfilling their reporting obligations.

Over time, as technologically challenged individuals continue to age out of the political system, this issue will become less significant. Even today, there is a certain minimum level of technological sophistication that we expect elected officials to have in order to discharge their responsibilities. Six years from now, this will be even more accurate.

Additionally, I will point out that candidates and elected officials are already required to file their F-1 personal financial disclosures online. It is objectively more difficult/confusing to file the F-1 than it is to complete a C-3 (contribution report) or C-4 (expenditure report).

**4) Would adopting this petition “bind the hands” of future Commissioners as described in the staff memo?**

Adopting this petition would not put anything in stone. If future Commissions saw a need to delay the phasing out of mini reporting, they would be free to do so. The Washington Administrative Code can be changed by following the APA’s rulemaking process.

It does not make sense for the agency to consider changes to WACs as “binding the hands” of future Commissioner. As the world changes, the WACs ought to be developed to reflect those changes. These improvements should be considered as positive. The PDC has developed beyond the need for mini reporting.