



State of Washington
PUBLIC DISCLOSURE COMMISSION

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Memo

To: Commissioners
From: Sean Flynn, General Counsel
Date: January 15, 2026
Re: APA Rulemaking Petition (Edwards) re Phasing Out Mini-Reporting

The Petitioner submitted a rulemaking petition on December 11, 2025. The Petition requests that the Commission adopt a rule change to end the mini-reporting filing option by 2032.

Under the Administrative Procedure Act (APA), a person may petition an agency requesting the adoption, repeal, or amendment of a rule. Within 60 days of the submission of a petition, the agency must either deny the petition, or initiate the rulemaking process. If the Commission denies the petition, it must state its reasons for the denial, addressing the concerns raised and alternative means of addressing the concerns, where appropriate.

Mini-reporting is authorized under RCW 29B.20.030(8), which allows the Commission to adopt rules to exempt campaigns from the full reporting schedule if the campaign does not receive or spend over \$7,000 in an election. Since the early days of the PDC, the Commission has exercised its rulemaking authority to relieve low-budget campaigns from contribution and expenditure reporting. The current rules establish that candidates and committees registering under the “mini reporting” option are, in addition to the overall \$7,000 maximum, also limited to accepting no more than \$500 from any single contributor (except, in cases of candidacies, the candidate themselves). (See WAC 390-16-105 through -125.) Please see the recent PDC Staff Report “Mini-to-Full Reporting Application Overview” December 2026 (attached), for a full summary of the mini-reporting system.

As cited in the Staff Report, mini-reporting continues to provide a popular option for small campaigns to comply with campaign finance requirements. Approximately 40-50 percent of filers in odd-year (local) elections choose mini-reporting, as do between 16-22 percent of filers in even-year (state) elections. In 2024-25, offices for which candidates chose mini-reporting the most include positions for city council (457) and school board director (414). Other candidates frequently using mini-reporting, as well, include candidates for fire commissioner (185), county charter review commissioner (182), hospital commissioner (126), and superior court judge (118). In addition, 135 PACs chose mini-reporting in 2024-25.

The petitioner argues that “[m]ini reporting prevents members of the public from viewing campaign finance information and creates an administrative burden for staff. PDC technological

improvements have taken away the need for this option.” While mini-reporting does reduce the ease with which the public can access campaign finance information from certain filers, this effect is by definition limited to candidates and committees with the least financial impact, and interested parties retain the right to inspect the books of account of mini-filers under RCW 29B.25.090(6). The availability of mini-filing arguably reduces the overall burden on PDC staff, as fewer reports are filed with the PDC by mini-filers, and their typically small, unsophisticated campaigns rely less on technical assistance from staff to complete and submit reports.¹

Given the extensive current use of the mini-reporting option, and its limited impact on transparency, it may be premature to conclude that mini-reporting should be ended. Furthermore, the proposed 8-year phasing-out period would have the effect of attempting to bind future commissioners, who would have the benefit of further experience with the current mini-filing system and the continuous improvement of PDC systems. While continued analysis of mini-reporting may be warranted, particularly in relation to enhanced campaign reporting systems, staff does not believe current circumstances support the adoption of the petition before the Commission today.

¹ Likely the greatest impact on PDC staff from mini-filing occurs when mini-filers choose to switch to full reporting, which requires them to complete and file the reports they otherwise would have filed, had they not selected mini-reporting initially.