Mini-to-Full Reporting Application Overview

Purpose: Examine the use of the mini reporting option available to campaigns and the process in which those campaigns apply to move to full reporting to identify trends and inform possible future policy discussions.

Background: RCW 42.17A.110(8) allows the Commission to "(a)dopt rules relieving candidates or political committees of obligations to comply with election campaign provisions of this chapter, if they have not received contributions nor made expenditures in connection with any election campaign of more than *five thousand dollars." (The $5,000 limit was revised to $7,000 in 2023 to reflect inflationary changes.)

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.)

The rules require a candidate or committee that expects to exceed the $7,000/$500 limits to apply to the PDC executive director for approval to move to full reporting and that they can't exceed the limits until that approval is granted.

These applications must be submitted on or before August 31st for the general election or 30 business days prior to the date of other elections. (Some exceptions exist, such as extending the deadline for candidates whose opponents are approved to move to full reporting.)

To be considered complete, an application must contain accurate and complete C-3 and C-4 reports disclosing activity since start of the campaign as well as proof that the candidate or committee has notified any opposing campaigns of their intention to move to full reporting. Once a PDC staff member verifies the application is complete and checks on whether the campaign has remained under limits, a report is prepared for executive director review and possible approval.

Getting to that step can take some time, especially for campaigns unfamiliar with PDC reporting. A typical mini-to-full process includes several, sometimes more than a dozen, back-and-forths between the PDC and campaign to verify reporting is up to date and correct. PDC staff's longstanding practice has been to work with the campaign past the deadline to perfect an application if necessary.

Data

Estimated staff hours per request:	Approx. 3 hrs from receipt to final response to filer (excludes executive review time)
Total time to process request:	Approx. 2.5 weeks from receipt to approval/verification

Reporting option chosen by campaigns each year:

	Mini	Full	% mini
2020	480	1,680	22.2%
2021	1791	1,792	50.0%
2022	509	1,843	21.6%
2023	1535	2,173	41.4%
2024	410	2,013	16.9%
2025	1626	2,246	42.0%

Mini-to-full activity by year:

	Total filers	Mini reporters	Mini-to-full Requests	Application Perfected After Deadline*	% Application Perfected Past Deadline
2022	2354	509	39	4	10%
2023	3709	1534	52	6	12%
2024	2426	410	15	1	7%
2025	3812	1550	69	12	17%

**Excludes special circumstances, such as opponent switching to full reporting.*

Mini-to-full applications by committee type/office sought:

	2022	2023	2024	2025	Total
Bonafide Committee	3	3	2		8
Other PACs	3	3	2	1	9
Charter Review Commissioner				8	8
City Council Member		20	2	25	47
County Assessor	2				2
County Auditor	5				5
County Clerk	3				3
County Commissioner	4	1	3		8
County Coroner	2				2

County Sheriff	4				4
District Court Judge	4				4
Fire Commissioner		3		3	6
Hospital Commissioner				3	3
Lieutenant Governor			1		1
Mayor		3		5	8
Park & Rec Commissioner		1			1
Port Commissioner	1	2		3	6
Public Utility Commissioner	4	1	1		6
School Director		14		22	36
State Representative	4	1	1		6
State Senator			1		1
Superior Court Judge			2		2
Water & Sewer Commissioner		1		1	2

Takeaways

- The mini reporting option is chosen by a large share of campaigns, especially during local election years when it represents roughly 40 percent of all campaigns registered with the PDC.
- The inflationary adjustment in 2023 does not seem to have increased the number of campaigns that select mini reporting. In 2021, roughly half of all campaigns registered under the mini reporting option. Changes to the registration application to encourage full reporting may have played a role.
- About 4 to 8 percent of mini reporting campaigns later change their reporting option.
- Mini-to-full requests require significant staff resources, especially in odd-numbered years when more local offices are on the ballot (i.e. 71 requests x 3 hrs = 213 staff hours).
- Some mini-to-full requests are not complete by the deadline; consideration may need to be given to stronger enforcement of deadlines or setting an earlier deadline for initiating the process.
- Once approved for full reporting, most campaigns remain relatively low-dollar, staying well under $20K.