discussed." § 3-305(d)(2). After the closed session, "the minutes for [the public body's] next open session shall include: (i) a statement of the time, place, and purpose of the closed session; (ii) a record of the vote of each member as to closing the session; (iii) a citation of the authority under § 3-305 of this subtitle for closing the session; and (iv) a listing of the topics of discussion, persons present, and each action taken during the session." § 3-306(c)(2).

Here, the Complainant alleges that the Board of Elections has routinely failed to make sufficiently detailed disclosures. Specifically, she complains that closing statements and minutes for six meetings[3] used "identical, non-specific," "template language." The Board of Elections responds that the Act did not apply to five of the six meetings because the body was performing an administrative function. But, the Board asserts, it prepared closing statements and minutes for each of the meetings and included all the details required by the Act.

1. Administrative functions

We begin with the Board's assertion that, in five of the meetings, the body was performing an administrative function to which the Act did not apply. It is true that, under § 3-103(a), the Act generally excludes from its scope any meeting in which a public body is performing an administrative function. The Act defines "administrative function" "by what it is—the 'administration' of laws, rules, regulations, or bylaws—and by what it is not—the other functions defined by the Act." 10 *OMCB Opinions* 12, 15 (2016) (quoting § 3-101(b)). "Thus, to determine whether a particular topic of discussion falls within a public body's administrative function, we apply a two-step inquiry." 17 *OMCB Opinions* 83, 87 (2023) (citing 16 *OMCB Opinions* 140, 155 (2022)). "First, the discussion cannot fall within one of the other functions defined by the Act—i.e., it cannot be advisory, judicial, legislative, quasi-judicial, or quasi-legislative in nature." 18 *OMCB Opinions* 62, 63 (2024); *see also* § 3-101(b)(2) (providing that "administrative function" does not include these other functions); *id.*(c) (defining "administrative function"); *id.*(e) (defining "judicial function"); *id.*(f) (defining "legislative function"); *id.*(*i*) (defining "quasi-judicial function"); *id.*(j) (defining "quasi-legislative function"). "If the discussion does fall within one of these functions, the inquiry ends because the discussion necessarily cannot be administrative in nature." 18 *OMCB Opinions* at 63. "If the first part of the inquiry is satisfied, then the second step requires that the discussion involve the administration of an existing law (or laws) that the public body is legally responsible for administering." 15 *OMCB Opinions* 11, 15 (2021).

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[3] The meetings in question took place on April 5, June 20, and July 9, 2024, and January 15, June 18, and August 12, 2025.