the written closing statement said that the closure was to "[a]void discussing personnel information the public isn't entitled to." Perhaps the Board of Elections meant that some law allowed—or even required—the Board to shield the discussion (or some information therein) from the public. But if that was the case, the written closing statement should have more clearly articulated that. Because it is not clear to us whether the body was required to prepare this written statement, however, we do not find a violation based on the Board's articulated reason for excluding the public.

3. Minutes

The Complainant alleges that the Board's minutes also use "generic, template language" that falls short of the Act's requirements.

As already noted, the four closed sessions that we have identified as administrative were not stand-alone meetings but, rather, meetings in which the Board of Elections adjourned open sessions to perform the administrative tasks behind closed doors. As such, the Board was required to disclose in its minutes the details enumerated in § 3-104, specifically: the date, time and place of the closed session; the persons present; and "a phrase or sentence identifying the subject matter discussed at the administrative function meeting."

We find that the Board of Elections failed to provide all these details in the minutes of those meetings involving closed sessions to perform administrative functions. The June 20, 2024, minutes, for example, indicate the time of the closed session, but fail to specify where the session took place, who was present, and what the subject matter was. The minutes refer only to "a personnel matter," but that was too vague to be informative. *See, e.g.*, 6 *OMCB Opinions* 96, 102 (2009) (observing that § 3-104 does not allow "mere parroting of [a] statutory term, i.e., 'review of an administrative item'"). The minutes of the other administrative sessions similarly violated the Act by failing to disclose all the details required by § 3-104.

Because the April 5, 2024, closed session was not administrative in nature, the disclosure requirements of § 3-306(c)(2) applied. Thus, the Board of Elections was required to include in its minutes the following details:

(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