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The Abundance of Reports and Incapacity of States[1]

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Abstract

The emergence of the "abundance" movement has raised central questions around state capacity, namely the state's ability to deliver services to citizens effectively. A central claim is that too much process, especially in blue states, has diminished state capacity and hollowed out government. Yet no systematic examination of complex processes across states and across time exists; measuring such differences is challenging, involving an immense number of statutory and regulatory materials. We here present the first empirical assessment of reporting requirements, a hallmark of administrative agencies, through an intensive survey of all fifty state codes, as well as reform proposals based on unique collaborations with California's Government Operations Agency, the Maryland Governor's Office, and the New York Governor's Office. First, drawing on these state partnerships to validate and utilize our AI statutory research tool, we comprehensively search over 500 million words of state statutes and document the prevalence of reporting mandates nationwide. Second, consistent with abundance proponents, we show that reporting requirements are more extensive in more Democratic jurisdictions. Partisanship, however, explains only a small part of the variation in reporting; the reporting thicket exists everywhere. Third, we demonstrate sharp growth over time. California's requirements increased roughly 400% from 2000 to 2025, in sharp contrast to civil service levels. Put differently, state employees are asked to do more with less. Fourth, the explosion of process is accompanied by noncompliance. Approximately 30% of California's ongoing, recurring reports may have never been filed. Based on novel internal surveys of agencies about each reporting requirement, four Maryland agencies recommended that nearly 20% of their combined reporting requirements should be removed. Aspirational transparency is practical incapacity. Fifth, we offer estimates for what is so often neglected in legislative mandates for reporting: the costs to produce such reports. Based on previously reported federal data, costs could exceed $1B annually. Based on novel surveys fielded in California and Maryland, we document dramatic variability in the costs of each report, with some being very cheap and others exorbitant—one report consumes 3,500 staff hours and over $870,000 to produce. Our evidence places our understanding and ability to reform the reporting thicket on more solid ground. Last, we discuss theoretical implications, especially on the need for abundance theorists to account for trade-offs, and offer model reforms to enable jurisdictions to tame reporting obligations and ensure that they improve, rather than incapacitate, public administration.

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Introduction

"Why doesn't government work in the US?" asks political scientist Francis Fukuyama in the *Financial Times*, wrestling with Americans' "enormous cynicism" toward public institutions.[7] The Biden administration promised rural broadband but was unable to distribute money that Congress had appropriated.[8] Multiple California governors promised high-speed rail, but only a fraction of a line has been built.[9] Politicians across the political spectrum have promised affordable housing, but the U.S. remains in what some estimate to be a 4.7 million housing unit deficit.[10] Together, these acute failures have raised concerns that American federal, state, and local government can no longer deliver for citizens, contributing to the current backlash against the administrative state.

Fukuyama is not alone. Ezra Klein and Derek Thompson's *Abundance*, a headline-grabbing volume, urged liberals to focus more on outcomes and less on process.[11] The best-seller came just months after Yoni Applebaum's *Stuck* and Marc Dunkelman's *Why Nothing Works*, both of which bemoan the impact of well-intentioned liberals on the government's ability to build.[12] Though legal scholars, political scientists, and historians had identified this challenge well before the rise of the "abundance agenda,"[13] Democrats' 2024 election loss and rising U.S.-China competition elevated discourse on "state capacity,"[14] the government's ability to pass and implement policies that satisfy the public's material needs.[15] By the end of 2025, Democratic politicians from Gavin Newsom to Bernie Sanders had explicitly accepted the underlying logic

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[7] Francis Fukuyama, *Why Doesn't Government Work in the US?*, FIN. TIMES (May 30, 2025), https://www.ft.com/content/44a69ce3-7398-40f4-9fff-5c89e04b6d38 [https://perma.cc/AGU8-NVMV].

[8] *See* John Hendel, '*People Need to See It': How Politics Hung up a $42B Biden Internet Buildout*, POLITICO (Sept. 4, 2024), https://www.politico.com/news/2024/09/04/biden-broadband-program-swing-state-frustrations-00175845 [https://perma.cc/X3WN-AGHP].

[9] *See* Benton Graham, *Billions spent, miles to go: The Story of California's Failure to Build High-speed Rail*, GRIST (Sept. 8, 2025), https://grist.org/transportation/billions-spent-miles-to-go-the-story-of-californias-failure-to-build-high-speed-rail [https://perma.cc/68YQ-UHZT].

[10] *U.S. Housing Deficit Grew to 4.7 Million Despite Construction Surge*, ZILLOW (July 9, 2025), https://investors.zillowgroup.com/investors/news-and-events/news/news-details/2025/US-housing-deficit-grew-to-4-7-million-despite-construction-surge/default.aspx [https://perma.cc/9Y92-SBX4].

[11] *See generally* EZRA KLEIN & DEREK THOMPSON, ABUNDANCE (2025)

[12] *See* YONI APPLEBAUM, STUCK (2025) (attributing American housing constraints to reform efforts that have given local communities greater veto power over new construction); MARC DUNKELMAN, WHY NOTHING WORKS (2025) (arguing that progressives have made power structures too diffuse for efficient development).

[13] *See, e.g.,* PAUL SABIN, PUBLIC CITIZENS: THE ATTACK ON BIG GOVERNMENT AND THE REMAKING OF AMERICAN LIBERALISM (2021); Nicholas Bagley, *The Procedure Fetish*, 118 MICH. L. REV. 345 (2020); Jerry Mashaw, *Reinventing Government and Regulatory Reform: Studies in the Neglect and Abuse of Administrative Law*, 57 U. PITT. L. REV. 405 (1996); Thomas McGarity, *Some Thoughts on "Deossifying" the Rulemaking Process*, 41 DUKE L.J. 1385 (1992).

[14] *See* DAN WANG, BREAKNECK: CHINA'S QUEST TO ENGINEER THE FUTURE (2025); Derek Thompson, *The Democrats Have a New Winning Formula*, SUBSTACK (Nov. 6, 2025), https://www.derekthompson.org/p/the-democrats-new-formula-the-affordability.

[15] *See* JUAN LINZ & ALFRED STEPAN, THE BREAKDOWN OF DEMOCRATIC REGIMES: CRISIS, BREAKDOWN, AND REEQUILIBRATION (1978) (introducing the term "state capacity").

of abundance.[16] As then-candidate for New York City mayor Zohran Mamdani emphasized, political leaders must prioritize "how we can actually deliver on the very ideas that we are so passionate about," because "any example of public inefficiency is an opportunity for the argument to be made against the very existence of the public sector."[17]

This focus on state capacity has been one pivot point for the abundance movement, but it is not one restricted to the left. Liberal and conservative commentators alike have complained of ineffective public institutions, overloaded with legal requirements that enhance accountability in theory but reduce efficiency in practice.[18] Hyper-proceduralization forces bureaucrats to allocate more time to compliance.[19] And with each additional compliance requirement, well-resourced stakeholders have more leverage to challenge administrative actions by alleging that agencies have not adhered to proper protocol.[20] This looming threat of judicial review distorts agency decision-making, preventing subject-matter experts from exercising the creative, independent judgment needed to devise effective government programs.[21] In effect, the buildup of procedures can produce a cumulative tax on efficiency that outweighs ostensible accountability benefits.[22]

One particular anxiety, voiced by abundance theorists, is that such burdens may be felt disproportionately in blue states, rather than red states. "Liberals speak as if they believe in government and then pass policy after policy hamstringing what it can actually do," write Klein and Thompson.[23] Indeed, much of the funding from President Biden's industrial policy, from the Infrastructure Investment and Jobs Act, to the Inflation Reduction Act, to the CHIPS and Science Act, resulted in funding flowing disproportionately to red states, where the obstacles to building may be lower.[24]

Recognizing the harms of procedural accretion, scholars have increasingly called for a reorientation in administrative law away from process as the be-all and end-all.[25] This shift does not just entail cultural change; it involves substantive reform to, among other laws and

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[16] *See* The Ezra Klein Show: *The Contradictions of Gavin Newsom* (Spotify, Dec. 10, 2025); The Opinions: *America's Next Story: Senator Bernie Sanders* (Spotify, Nov. 3, 2025).
[17] *See* Plain English with Derek Thompson: *NYC Mayoral Candidate Zohran Mamdani on Abundance, Socialism, and How to Change a Mind* (Spotify, June 23, 2025).
[18] *See, e.g.,* Bagley, *supra* note 13, at 353.
[19] *See* David Pozen, *Freedom of Information Beyond the Freedom of Information Act*, 165 PENN. L. REV. 1097, 1123 (2017) (noting that procedural compliance prevents bureaucrats from prioritizing substantive work).
[20] *See* Wendy Wagner, *Administrative Law, Filter Failure, and Information Capture*, 50 DUKE L.J. 1321, 1333-34 (2010) (highlighting the impact of private sector litigation threats on administrative agencies' notice-and-comment processes).
[21] Jennifer Pahlka & Andrew Greenway, *The How We Need Now: A Capacity Agenda For 2025 And Beyond*, NISKANEN CENTER (2024), https://www.niskanencenter.org/wp-content/uploads/2024/12/Niskanen-State-Capacity-Paper_-Jen-Pahlka-and-Andrew-Greenway-2.pdf [https://perma.cc/H7F2-UCPE].
[22] *See* Pozen, *supra* note 19, at 1124.
[23] KLEIN & THOMPSON, *supra* note 11.
[24] *See* Matt Egan, *Red States Are Big Winners of Biden's Landmark Laws*, CNN (Feb. 14, 2024 at 9:00 ET), https://www.cnn.com/2024/02/14/business/manufacturing-jobs-biden [https://perma.cc/C8DZ-9STY]; *see also* Samyukta Shrivatsa et al., *What's in a Definition? The Bipartisan Infrastructure Law's Impact on Drinking Water Funding for Disadvantaged Communities* (2026) (unpublished manuscript) (submitted to NATURE COMMC'NS).
[25] *See, e.g.,* Bagley, *supra* note 13, at 349 ("I hope to call into question the administrative lawyer's instinctive faith in procedure, to reorient discussion to the trade-offs at the heart of any system designed to structure government action, and to soften resistance to the relaxation of unduly burdensome procedural rules.").

institutions, the Office of Information and Regulatory Affairs (OIRA), the Administrative Procedure Act (APA), and the Freedom of Information Act (FOIA) (along with their state-level equivalents).[26] These hallmarks of administrative law ostensibly ensure government legitimacy and accountability but, commentators argue, fall short on both fronts.

Yet no systematic examination of complex processes across states and across time exists. Measuring such differences is challenging, involving an immense volume of statutory and regulatory materials. We focus here on one often lamented process: legislatively mandated reporting requirements.[27] As Fukuyama noted, poor government service delivery stems, in part, from "the detailed and often pointless rules" bureaucrats must adhere to, which forces them to prepare reports "which nobody reads" rather than prioritize substantive policy execution.[28] In government offices across the country, thousands of civil servants spend countless hours every week writing reports, some of which may inform future program implementation, but many of which go unread or unpublished. Justice Neil Gorsuch points to a single report on the printing operations of the Social Security Administration that consumes four months of time from 95 employees.[29] Often, civil servants recognize that the documents they generate will likely collect dust: "I don't even think our printer can handle the thousands of pages of health information I have to compile," said one Maryland government employee.[30] And yet, the reports continue to accumulate—not because administrative agencies want to prioritize them, but because state and federal law require their production.

Little scholarship to date has addressed these government mandates, perhaps because reporting requirements, though pervasive across federal and state administrative agencies, are scattered across disparate statutes, not concentrated in a single bill like the APA. Consider, for example, Section 8-807 of the Agriculture article of the Maryland state code, which requires the Maryland Department of Agriculture to prepare an annual report for the governor and general assembly "on the production and use of animal manure by farm operations covered by nutrient management plans."[31] Rather than impose general procedural requirements on all Maryland agencies, it obligates a specific agency to track narrow, specific metrics. Nevertheless, Section 8-807 demands agency time and resources. And when such provisions snowball, they can "seriously impair the vigor with which an agency pursues its aligned mission."[32] With few tools to catalog reporting requirements across thousands of disconnected statutes, empirically assessing the claims of abundance and state capacity has been challenging.

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[26] *See* MARGARET KWOKA, SAVING THE FREEDOM OF INFORMATION ACT (2021); Wagner, *supra* note 20, at 1416 (proposing reforms to the notice-and-comment process).
[27] *See* David Fahrenthold, *Unrequired Reading*, WASH. POST (May 3, 2014), https://www.washingtonpost.com/sf/national/2014/05/03/unrequired-reading [https://perma.cc/7A3W-7WPL] (quantifying growth in federal reporting requirements).
[28] *See* Fukuyama, *supra* note 7.
[29] Neil Gorsuch & Janie Nitze, *America Has Too Many Laws*, THE ATL. (Aug. 5, 2024), https://www.theatlantic.com/ideas/archive/2024/08/america-has-too-many-laws-neil-gorsuch/679237 [https://perma.cc/BAQ4-UXRQ].
[30] Telephone Interview with employee from Maryland Department of Health (Aug. 6, 2024).
[31] MD. AG. CODE § 8-807 (2024).
[32] *See* Bagley, *supra* note 13, at 352.

We fill this gap by providing the first systematic account of the evolution, prevalence, burden, and compliance of legislative reporting requirements. As Nick Bagley has noted, procedural sludge accumulates in part because "we lack good evidence about how most administrative procedures affect [the balance between efficiency and accountability]."[33] Without reliable data, policymakers discount the costs of new procedures and overweight the benefits. And when legislators lack cost information entirely—as is often true for reporting requirements—procedures can function as unfunded mandates on agencies.[34] This Article offers the first cross-state systematic evidence to inform this cost-benefit analysis.

Crucially, we do not take the position that reporting is uniformly good or bad. Many reporting requirements have been central for policy, such as the Jobs Report by the Bureau of Labor Statistics, the Federal Reserve's monetary reports, and the Census Bureau's American Community Survey. Others are obscure, but time consuming to produce. The north star for policymakers is ensuring that agencies are "capable, informed, prompt, responsive, and fair," an objective that reporting requirements can enhance or hinder.[35] Here, we provide evidence to better assess the trade-offs with reporting obligations and offer a concrete reform framework based on in-depth collaborations and unique internal data from three state partners: California's Government Operations Agency, the Maryland Governor's Office, and the New York Governor's Office.

We base our analysis on a first-of-a-kind systematic scan of the entire 500-million-word corpus of state statutes for reporting requirements, as well as partnerships with California, Maryland, and New York to streamline reporting requirements.[36] Scrutinizing state agencies in detail is valuable given the clear opportunity states have to reform agency reporting. Because state and local governments "do most of the things 'the state' does," the "roots" of the state capacity crisis "are in state and local governments."[37] The federal government, moreover, has taken recent steps to address reporting bloat. In 2024, Congress passed the Eliminate Useless Reports Act, which requires federal agencies to list outdated or duplicative reporting requirements in their annual budget justifications.[38] States have yet to adopt similar legislation, increasing the urgency of state-level partnerships.

We make five contributions. First, we begin by documenting the prevalence and growth of legislatively mandated reporting requirements across all 50 states, using a custom AI statutory search tool validated by state agencies.[39] Second, consistent with proponents of abundance, we find that reporting requirements exhibit a statistically significant increase in the Democratic two-

[33] *Id.*
[34] *See infra* section II.
[35] *See* Bagley, *supra* note 13, at 379.
[36] We also engaged North Carolina on recall for government reports, but due to data limitations, we have excluded our work with North Carolina from this paper.
[37] David Schleicher & Nicholas Bagley, *The State Capacity Crisis*, 66 BOSTON COLLEGE L. REV. 2301, 2306 (2025).
[38] ELIMINATE USELESS REPORTS ACT, PUB. L. NO. 118-172 (2024).
[39] Faiz Surani et al., *What Is the Law? A System for Statutory Research (STARA) With Large Language Models*, in PROCEEDINGS OF THE TWENTIETH INTERNATIONAL CONFERENCE ON ARTIFICIAL INTELLIGENCE AND LAW (2025), https://doi.org/10.1145/3769126.3769219.

party vote share, even after controlling for state government size. Democratic legislatures tend to demand more process. We also find significant associations based on policy domain: Democratic-leaning states allocate a larger share of their reporting requirements to housing, health, and the environment, while Republican-leaning states allocate a larger share to budget and finance, government oversight, and education. At the same time, we show that partisanship only explains a small fraction of the variation in reporting requirements: reporting thickets are pervasive. Third, we assess how such reports have grown over time, in sharp contrast to civil service levels. In California, reporting requirements have increased over 400% between 2000 and 2025, dwarfing any changes in civil service levels. These data underscore the relevance of reporting requirements to the broader state capacity debate. They demonstrate starkly that state employees are asked to do more with less.

Fourth, we show that the accumulation of reporting requirements is accompanied by substantial noncompliance. Based on available filing data, in California, approximately 30% of ongoing, recurring reporting requirements may have never been fulfilled, raising doubts about the value of additional reporting obligations, but also suggesting how bureaucracies adapt to infeasible demands. When legislators propose new reporting mandates, they typically argue that such mandates will elevate transparency and accountability. Our evidence indicates that these purported benefits may fail to materialize. Reporting in one dimension crowds out accountability in another. Aspirational transparency is practical incapacity.

Fifth, we assess the costs and benefits of reporting requirements by estimating the reading burden on legislators in Maryland, extrapolating federal costs from previously reported baselines, and measuring download statistics of reports. The Maryland and federal cost information underscores the dangers of framing reporting requirements only as transparency tools. To be sure, reporting requirements can promote good governance. But they can also stymie government effectiveness; governments that do not systematically weigh reporting benefits against costs have not solved the administrative optimization challenge. Indeed, based on federal data, costs could exceed $1B annually. At the state level, through report-level cost estimates provided by state collaborators in California and Maryland, we document dramatic variability in the costs of each report, with some being very cheap and others exorbitant—one such report alone consumes 3,500 staff hours and over $870,000 to produce. On the benefits front, we find that one measure of impact—the number of times a report is downloaded—also exhibits astonishing variability. Some reports are downloaded only five times annually; others tens of thousands of times; and this variance does not appear rationally related to cost. Governments should more rigorously track both benefits and costs to achieve appropriate reporting levels.

Last, we discuss theoretical implications, especially on the need for abundance theorists to account for trade-offs, and we develop policy recommendations for states to strike a better balance. Our chief recommendations include default sunsetting, automatic report expiration upon program termination, mandatory estimates of production costs, a digital report repository, unique report identifiers, and conversion of quantitative reports into automated data dashboards or queryable open data. Such provisions are critical to enable governments to rationally weigh the

trade-offs in addressing the state capacity crisis. As one Maryland official admitted, state legislatures today "only consider the benefits of more reports, not the costs."[40] This myopic view misses half of the equation. Our partnership with the New York Governor's Office supported New York's "Regulatory Reset," "the nation's most expansive state effort to systematically review outdated regulations and improve government efficiency," which was launched by Governor Kathy Hochul's Executive Order No. 61.[41] Our collaboration with the California Government Operations Agency triggered their SMART reporting initiative, which includes an "Analytics Accelerator" that facilitates transformation of paper reports into data dashboards, automation of data reporting, and effective data visualization. Such reform can ensure that reporting improves, rather than detracts from, public administration.

I. Reporting Requirements as a Window into the State Capacity Crisis

Abundance proponents advance a broad indictment: American government is drowning in process. From environmental review, *e.g.*, the National Environmental Policy Act (NEPA),[42] to notice-and-comment rulemaking,[43] to FOIA compliance,[44] procedures designed to ensure accountability have metastasized into obstacles to effective governance. However intuitively compelling, this perspective has been difficult to test empirically. Procedures are scattered across thousands of statutes, and cumulative burdens are rarely measured.

Procedural buildup, moreover, is hard to separate from the broader dynamics of adversarial legalism, a core focus of abundance scholarship.[45] When statutes create private rights of action against government agencies, agencies implement procedures to minimize legal risk.[46] Each additional procedure, though, gives stakeholders a new avenue for litigation by challenging the government's very adherence to the procedure it devised. This legal dynamic triggers even more procedures, spawning a vicious cycle. With such intense discussion among abundance advocates on the legalistic nature of procedural accretion,[47] it can be hard to determine whether

[40] Telephone Interview with Maryland state official (Nov. 13, 2025).
[41] Press Release, Governor's Press Office, *Cutting Red Tape: Governor Hochul Issues Executive Order Kicking Off "Regulatory Reset" to Save New Yorkers Time and Money* (July 8, 2026), https://www.governor.ny.gov/news/cutting-red-tape-governor-hochul-issues-executive-order-kicking-regulatory-reset-save-new; N.Y. Exec. Order No. 61 (2026), https://www.governor.ny.gov/executive-order/no-61-directing-new-york-state-agencies-reform-outdated-regulations-and-policies.
[42] Zachary Liscow, *State Capacity of Building Infrastructure*, *in* STRENGTHENING AMERICA'S ECONOMIC DYNAMISM 96, 114 (Melissa Kearney and Luke Pardue eds., 2024), https://dx.doi.org/10.2139/ssrn.5045644.
[43] *See* Wagner, *supra* note 20, at 1333–1334.
[44] *See* Pozen, *supra* note 19, at 1115.
[45] *See, e.g.*, ROBERT KAGAN, ADVERSARIAL LEGALISM (2019) (observing that American legalistic dispute resolution can impede policy implementation).
[46] *See* Pahlka & Greenway, *supra* note 21.
[47] *See, e.g.*, WANG, *supra* note 14, at xv (describing the U.S. as a "lawyerly society, blocking everything it can, good and bad").

the abundance movement is about streamlining procedure to bolster state capacity or more fundamentally rethinking the role of the law in American public policy.

Legislatively-mandated reporting requirements offer an unusual opportunity to isolate and examine the core abundance claim—that procedural accretion, *as such*, taxes state capacity—helping scholars better understand the proportionate impact of procedural quantity versus legalistic quality. They exhibit, in condensed form, the pathologies of procedural accretion: new mandates arise from legitimate concerns (transparency, oversight, accountability), accumulate over time, and impose burdens that no single legislator intended.

Unlike permitting requirements or rulemaking procedures, reporting mandates rarely create private rights of action. When agencies fail to produce a required report, they do not face endless litigation from corporate trade associations or advocacy groups. At most, they risk legislative oversight hearings—a threat that, as we show below, carries little practical weight given legislatures' systematic failure to police agency reporting.[48] Costs borne by agencies, then, directly reflect the potential dangers of procedural accretion *qua* procedural accretion, not procedural accretion as a proxy for legal slowdown. When reports accumulate, agencies devote more money and staff time to compiling documents. In turn, if the reporting requirements do not provide commensurate benefits, agencies end up with less capacity to carry out their substantive missions. These costs underscore the inherent risks of, and trends toward, procedural growth, irrespective of adversarial legalism.

Reporting requirements are also uniquely pervasive. While NEPA permitting requirements significantly impact infrastructure development, they tend only to affect agencies that oversee public works projects or approve permits for public and private projects.[49] Even hallmark administrative procedures lack the reach of reporting requirements: as of 2017, for example, only 29 federal agencies had administrative law judges, most of which worked in the Social Security Administration.[50] Nor does every agency have rulemaking authority. At the federal level, the Office of Science and Technology Policy and the Council on Environmental Quality, among others, lack the power to issue binding rules.[51] For these agencies, notice-and-comment rulemaking and other provisions of the APA do not seriously impair state capacity. On the other hand, virtually every agency faces some reporting mandate: at minimum, legislators require budgetary updates to monitor policy execution. This ubiquity makes reporting requirements a shared challenge across the administrative state in a way that other oft-cited state

[48] Jonathan Pray, *Congressional Reporting Requirements: Testing the Limits of the Oversight Power*, 76 U. COL. L. REV. 297, 304 (framing Congress's oversight power as a key check on administrative agency reporting noncompliance).
[49] *See* Nikki Chiappa, Ted Nordhaus, Alex Trembath & Elizabeth McCarthy, *Understanding NEPA Litigation: A Systematic Review of Recent NEPA-Related Appellate Court Cases*, BREAKTHROUGH INSTITUTE (July 11, 2024), https://thebreakthrough.org/issues/energy/understanding-nepa-litigation [https://perma.cc/5MQX-FH9H].
[50] *See* Office of Personnel Management, *ALJs By Agency*, https://www.opm.gov/services-for-agencies/administrative-law-judges/#url=By-Agency [https://perma.cc/99GR-F3BA], (last visited February 1, 2026).
[51] See Marin Audubon Soc'y v. FAA, No. 23-1067 (D.C. Cir. Nov. 12, 2024).

capacity roadblocks are not. If reformers can streamline the broader reporting requirement process, they can likely boost the functioning of all agencies, not just a subset.

More fundamentally, reporting requirements are a microcosm of the governance crisis that abundance advocates have placed at the center of American political debate: the possibility that well-intentioned procedural safeguards, accumulated over decades, have collectively undermined the state's ability to deliver for citizens—a dynamic visible well before political scientists coined the phrase "state capacity." In 1928, when Congress mandated only 303 reports, legislators worried that they had saddled agencies with excessive procedures.[52] Though they cut 128 requirements that session, Representative Fiorello La Guardia clamored for more: "Why do you not abolish 300 of them and leave three?" he quibbled.[53] This cycle—a gradual buildup followed by sudden episodic demands for repeal—has repeated throughout the twentieth century and into the present. In 1980, Congress eliminated or consolidated 131 reports through the Congressional Reports Elimination Act.[54] Two years later, the Congressional Reports Elimination Act of 1982 cut an additional 77 reports.[55] Additional examples abound: the Congressional Reports Elimination Act of 1986, the Federal Reports Elimination and Sunset Act of 1995, the Federal Reports Elimination Act of 1998, and, most recently, the Eliminate Useless Reports Act of 2024.

The persistence of this multi-decade legislative cycle frames reporting requirements as an enduring feature of government reform efforts and illuminates a deeper problem. Legislators recognize, at least intermittently, that too much reporting can impede agency performance. But they also have trouble understanding how much is too much. Just as soon as Congress eliminates 131 reports, it adds 575.[56] The ease with which new requirements emerge, and the difficulty legislators have monitoring their aggregate effects, transforms efficient agency reporting into a Sisyphean task. Reporting requirements thus encapsulate the central challenge facing procedural reformers: how to arrest the ratchet of accretion when each individual mandate seems reasonable and the cumulative burden remains invisible.

Assessing reporting requirements, then, is not merely analytically convenient. Rather, it offers a tractable and important entry point into the broader state capacity debate—a domain where the dynamics of procedural growth can be measured, their costs estimated, and potential reforms tested. If the abundance movement is correct that too much process has hollowed out government, reporting requirements are a place to look for evidence. And if reformers can develop tools to rationalize reporting, they will have demonstrated a model applicable to procedural reform more broadly. Yet as we show below, our assessment also has plenty of implications for abundance proponents themselves.

[52] *See* Fahrenthold, *supra* note 27.
[53] *Id.*
[54] H.R. Rep. No. 96-1268, at 1 (1980), reprinted in 1980 U.S.C.C.A.N. 4675.
[55] H.R. Rep. No. 97-804, at 1 (1982), reprinted in 1982 U.S.C.C.A.N. 3435.
[56] *See* Pray, *supra* note 48, at 302–303.

II. The First Systematic Account of State Reporting Requirements

We begin by directly measuring the costs, accumulation, and compliance rates of agency reporting requirements. The federal government's last comprehensive reporting assessment dates to the 1980s, when the Government Accountability Office (GAO) documented explosive growth in congressional reporting mandates; yet even that analysis acknowledged that "complete, consistent, and precise data are not available."[57] At the state level, the information gap is starker: to our knowledge, no prior study has attempted to enumerate reporting requirements across all state codes.

This data shortfall matters. As Peter Drucker famously said, "If you can't measure it, you can't manage it." In 2014, the *Washington Post* reported that "nobody in Washington can say how many reports are actually done every year."[58] When legislators lack cost information entirely and cannot weigh it against quantifiable benefits, as is often true for reporting requirements, procedures become unfunded, potentially counterproductive, mandates on agencies. Policymakers discount the downsides of agency reporting and overweight the purported benefits, continuously enacting more reporting requirements than agencies can handle. Perhaps Congress understood the scope of reporting requirements when it maintained only 303, but long-term reporting accumulation has long since "overwhelmed" federal officials.[59] Providing legislators with better cost and benefit information may not solve the reporting challenge overnight, but it can at least kickstart a more data-driven approach to reporting management that accounts for both the upsides and likely downsides of additional reports.

We draw on six extensive and novel sources to analyze, characterize, and develop a rigorous understanding of the reporting landscape. We provide a brief overview of our data collection process here to underscore key theoretical motivations for this paper, and relegate detailed descriptions of these sources, specifics of the methodology and validation approaches, and associated limitations to the Appendix.

First, we independently compiled all 50 state statutory codes, totaling over 500 million words, from which we compile a comprehensive list of reporting requirements using the Statutory Research Assistant (STARA), an AI-based legal research tool designed to systematically identify statutory provisions within large legal corpora.[60] Recent evaluations have shown that existing commercial legal AI research tools, even those explicitly marketed for multi-jurisdictional statutory surveys, perform worse at identifying legal requirements than effectively random chance, whereas STARA leverages careful preprocessing, attention to statutory hierarchy, and systematic large language model (LLM)-assisted review to substantially boost

[57] *See* U.S. Gov't Acct. Off., PAD-82-12, *A Systematic Management Approach Is Needed for Congressional Reporting Requirements* (1981).
[58] Fahrenthold, *supra* note 27.
[59] *Id*.
[60] *See* Surani et al., *supra* note 39. Our application of STARA for this project does not employ context augmentation (cross-references, definitions, and parent provisions).

accuracy.[61] Leveraging STARA to meticulously comb through 500 million words of statutory text allows us to tackle one of the primary challenges of reporting requirement reform: properly cataloguing the landscape of existing reporting requirements.

For every state, we used STARA to evaluate each potentially relevant provision against three baseline criteria: *(1)* the provision must require the submission of a formal, substantive written report of non-negligible length, in contrast to information sharing as part of standard administrative procedures or other informal notifications; *(2)* the submitting entity must be a member of the executive branch of the state government (excluding judicial, legislative, local, and private entities); and *(3)* the report must be submitted to a state-level legislative or executive branch entity, or required to be publicly disclosed (excluding judicial and private recipients). Provisions meeting all three criteria were classified as reporting requirements, with the model extracting structured information on reporting frequency, policy domain, and other characteristics.

Our three state partnerships underscored a core design challenge: that different agencies may prefer narrower or wider definitions of reporting requirements, depending on their particular capacity and conditions for review and reform. We iterated extensively with our collaborators to understand these nuances and explored different variations to our STARA workflow, including upstream keyword filters, LLM prompt refinement, and ex post categorization, which allow different agencies to uniquely navigate the precision−recall tradeoff (*i.e.*, maximizing hit rate versus casting a wider net). Validation, likewise, required a careful approach to capture these state-specific definitional nuances. In particular, while we determined that our baseline criteria provide a reasonable set point for the purposes of our 50-state compilation—yielding 92% recall on over 1,800 reports from one state's centralized yet incomplete reports—specific agencies may choose to target their review on a more limited definition of reports, while other agencies may opt for even more comprehensive results than we consider here. We provide more details in Appendix C, but we show that a more expansive prompt results in 97% recall, at the cost of lower precision. This data is offered as a starting point to systematically track state-level reporting requirements, to understand reporting by policy domain, and to broadly motivate human-centered and agency-engaged reform.

Second, to test the widely held thesis that blue states are disproportionately trapped in administrative process, we linked STARA analysis of statutory text with three measures of state-level partisan leaning: Democratic two-party vote share from the 2024 presidential election, status of unified vs. divided government ("trifecta" status refers to unified control of the governor's office and all chambers of the legislator), and a historical partisanship classification based on presidential election outcomes from 1988–2024. Additional details can be found in Appendix D.4.

Third, we merge in data on state government and population attributes to control for other reasons that may account for variation in reporting requirements. A higher number of reporting

[61] *See* Afane et al., *Benchmarking Legal RAG: The Promise and Limits of AI Statutory Surveys*, in ACM SYMPOSIUM ON COMPUTER SCIENCE AND LAW (2026), https://doi.org/10.1145/3788646.3789533.

requirements in Democratic states, for instance, could simply reflect more robust public programs in blue states or different levels of economic activity. To draw clearer inferences on key drivers of reporting requirements across states, we obtained a cross-section of state fiscal and administrative characteristics from the Correlates of State Policy Project (CSPP) and normalized reporting requirements against these characteristics.[62] We use 2016 as the reference year, representing the most recent year with adequate coverage across variables of interest. We collected the following variables: total population, number of full-time state government employees, total state expenditures (in thousands of current dollars), general state expenditure (in thousands of current dollars), general state expenditure devoted to public welfare (in thousands of current dollars), total revenue (in thousands of current dollars), and real GDP (in millions of chained 2009 dollars). Appendix Table 3 shows associations between these variables and reporting requirements.

Fourth, we integrate state-level report catalogs from California and Maryland. The California Legislative Counsel Bureau maintains the Agency Reports portal, a centralized database tracking reports submitted by state agencies to the legislature and other entities.[63] The portal includes metadata on senders, statutory basis, filing dates, and report status, enabling tracking of not just how many reports are required, but how many are actually produced—the gap between legislative intent and administrative reality. The Maryland Department of Legislative Services (DLS) Library maintains an online catalog of reports submitted to the Maryland General Assembly including bibliographic metadata and digital document links.[64] We accessed the catalog in 2025 to retrieve reports published in 2023, representing the most recent complete fiscal year. While not a compliance database per se, the catalog helps quantify the volume of material that legislators are expected to review.

We used these catalogs to analyze *(1)* the rates at which administrative agencies comply with statutorily-mandated reporting requirements and *(2)* the theoretical time burden that agency reports impose on intended readers, assuming that all reports are produced and read in full. Compliance rates reveal both whether reporting requirements serve their intended transparency function and whether agencies have capacity to shoulder additional reporting obligations. If agencies consistently fail to deliver a sizable share of reports, the agency has perhaps reached its procedural limit. Alternatively, the reports the agency has neglected may not be cost-justified. We treated the presence of a filing date as evidence of compliance and estimated how many ongoing, recurring reports have never been filed. Additional details can be found in Appendix F. These compliance trends can expose opportunities for procedural improvement.

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[62] *See* Matt Grossmann et al., *The Correlates of State Policy and the Structure of State Panel Data*, 21 STATE POL. & POL'Y Q. 430 (2021), https://doi.org/10.1017/spq.2021.17.

[63] *Search for Agency Reports*, Cal. Agency Reports, https://agencyreports.ca.gov [https://perma.cc/6PKF-584N] (last visited February 6, 2026).

[64] Md. Legislative Library & Information Services, *Maryland Documents*, MD. DEPARTMENT OF LEGISLATIVE SERVICES, https://mlsd.ent.sirsi.net/client/en_US/default/search/detailnonmodal/ent:$002f$002fSD_ILS$002f0$002fSD_ILS:28260/one [https://perma.cc/DZ2R-ZFGK] (last visited February 6, 2026).

Reading time estimates provide a concrete sense of the scale and utility of reporting requirements. We estimated the time legislators would need to review Maryland's annual reporting output by collecting page counts for reports in the DLS catalog and applying evidence-based reading speed benchmarks informed by established research.[65] This calculation makes the abstract problem of "report overload" concrete.

Fifth, through the collaboration with California and Maryland, we fielded surveys to cabinet level agencies to provide information about specific reports. Agencies were asked to provide estimates of the impact, cost (employees, time), and assessments of the relevance of the reporting requirement. This provides a unique and rich internal perspective on how agency officials themselves see the value and costs of each distinct reporting requirement. To our knowledge, it represents the only attempt ever to systematically elicit information to understand impact, costs, and relevance at the report level using internal agency records.

Finally, we used historical federal reporting cost data from GAO to estimate current federal reporting costs, adjusting for inflation and accounting for the growth in requirements since the 1980s. Though this approach provides only a rough approximation of existing reporting burdens, we believe that including quantitative estimates is key to making the reporting challenge—and procedural bloat more broadly—more concrete. Excessive reporting requirements are not trivial; they can cost agencies millions of dollars, limiting agencies' ability to respond to other pressing matters. Additional details on our use of federal cost data can be found in Appendix G.

A. The Prevalence and Partisanship of Reporting Requirements

We first mapped the reporting landscape nationwide. Conducting an expansive search across all 50 state codes, we identified 41,925 provisions potentially containing 47,305 state reports.[66]

Mapping the correlation between Democratic two-party vote share and reporting burdens allows us to track whether procedural bloat is more pronounced in Democrat-led jurisdictions, as abundance advocates suggest. Across podcast appearances and TV interviews, Klein and Thompson have continuously framed Democrats as the target of the abundance agenda.[67] By their account, Democrats are too concerned with centralized government power, have overloaded administrative agencies with excessive process, and have become too legalistic—allowing an endless array of stakeholders, well-intentioned or otherwise, to exploit private rights of action

[65] *See* Marc Brysbaert, *How Many Words Do We Read Per Minute? A Review and Meta-Analysis of Reading Rate*, 109 J. MEM. LANG. (2019).
[66] Our full dataset of state reporting requirements is available at https://statereporting.reglabapp.com.
[67] *See, e.g.*, MEHDI UNFILTERED: *Mehdi Challenges Derek Thompson on Democrats and the "Abundance Agenda"* (Spotify, April 23, 2025).

and slow infrastructure development.[68] These Democrat-centric critiques appear throughout the latest wave of abundance and state-capacity polemics.[69]

So, does the prevalence of state-level reporting requirements reflect abundance claims about the accumulation of process in Democratic jurisdictions? Figure 1 shows that the number of reporting requirements is, indeed, positively and statistically significantly correlated with Democratic two-party vote share (in the 2024 presidential election), even after adjusting for state government size. These results hold both after including and excluding outlier states, and for a subset of reports that are likely to be recurring: ongoing periodic reporting without a specified end date. To supplement our point-in-time vote share analysis, we also look at historical presidential voting patterns between 1988 and 2024, and we find a significantly higher count of reporting requirements in consistently Democratic states compared to consistently Republican states (see Appendix Figure 4).

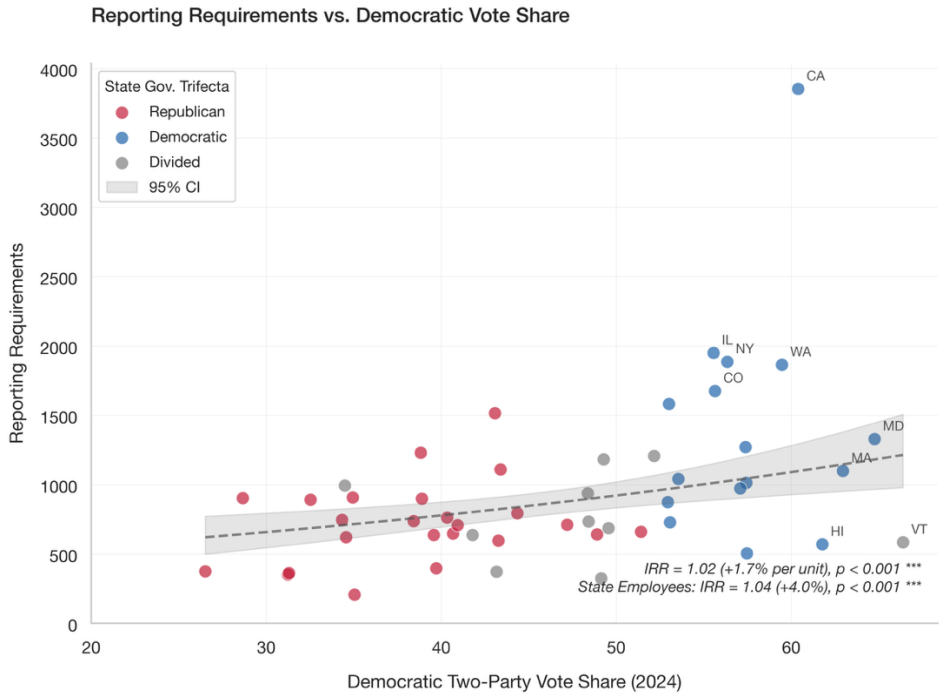

Figure 1. Reporting Requirements and Democratic Two-Party Vote Share. Data points are colored according to state government trifecta status. Regression line and incidence rate ratios (IRR) represent a negative binomial regression between reporting requirements and Democratic two-party vote share (2024), correcting for size of state government by 10K employees (2016). Asterisks indicate statistical significance (*$p < 0.05$, **$p < 0.01$, ***$p < 0.001$).

[68] *See* KLEIN & THOMPSON, *supra* note 11.
[69] *See* APPLEBAUM, *supra* note 12; DUNKELMAN, *supra* note 12; SABIN, *supra* note 13.

That said, we observe wide variation across jurisdictions, and partisanship only marginally explains 1.4% of the variation in reporting requirements.[70] Abundance theorists are right that procedural bloat disproportionately affects blue states, but it does not do so exclusively. The reporting thicket is pervasive. This may reflect the structural nature of procedural accretion; as Jennifer Pahlka and Andrew Greenway have observed, in implementing any government program, bureaucrats face a "tyranny of tiny decisions," qualifiers that are "individually proportionate and sensible responses to possible risk," but disproportionately burdensome in the aggregate.[71]

Given how much abundance theorists have focused on housing and the interaction of environmental requirements and housing, we also examined whether partisan composition is associated with the allocation of reporting requirements across policy domains. Large language models are uniquely capable of extrapolating substantive trends from statutory reporting requirements, so we used STARA to categorize reports by policy domain (see Appendix Figure 3).[72]

The results in Table 1 reveal a clear ideological signature.[73] Democratic-leaning states devote a significantly larger share of their reporting requirements to housing ($r = 0.71$, $p < 0.001$), health ($r = 0.48$, $p = 0.002$), and environment ($r = 0.41$, $p = 0.006$). For instance, California's Department of Housing and Community Development is required to "submit an annual report to the Governor and both houses of the Legislature on the operations and accomplishments during the previous fiscal year of the housing programs administered by the department."[74] According to the 163-page, 2023−24 edition of the report, the report is produced to simultaneously satisfy twenty-three other distinct legislatively mandated reporting requirements,[75] nearly all of which are individually identified by STARA. Washington's Department of Health is required to "submit a report to the appropriate committees of the legislature on the content and distribution of the statewide drug overdose prevention and awareness campaign,"[76] particularly regarding the dangers of methamphetamines and opioids.

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[70] We calculated this percentage using a difference in McFadden's R^2.

[71] *See* Pahlka & Greenway, *supra* note 21.

[72] Policy domain was assigned by the language model based on statutory text, out of a provided list of values: budget_finance, housing, transportation, environment, public_safety, economic_development, social_services, government_oversight, health, education, elections, labor_employment, other.

[73] We computed Pearson correlations between Democratic two-party vote share in the 2024 presidential election and the proportion of each state's requirements devoted to each domain. After adjusting for multiple comparisons using a Benjamini-Hochberg correction, 17 of 90 domain-filter combinations showed significant correlations (adjusted $p < 0.05$).

[74] CAL. HEALTH & SAFETY CODE §50408 (2024).

[75] *See* Cal. Dept. Hous. & Comm. Dev., *Annual Report, Fiscal Year 2023-24*, https://www.hcd.ca.gov/sites/default/files/docs/policy-and-research/plan-report/annual-report-23-24.pdf [https://perma.cc/Z7E4-AQVW], at 1.

[76] WASH. REV. CODE § 43.70.768 (2024). Republican states are, of course, not devoid of reporting requirements related to the national substance abuse epidemic. But in Wyoming, for its methamphetamine and substance abuse treatment grant program, the state only mandates reporting at the initial funding request stage "to set forth the manner in which the on-going operations of the program will be financially sustained," in stark contrast to Washington's outcome-oriented focus on "measurable benchmarks to determine the effectiveness of the campaign." Such additional qualitative dimensions, *i.e.*, differences between fiscal austerity and program evaluation, are

Connecticut requires *biannual* reports from "state agencies that are members of the Governor's Steering Committee on Climate Change . . . [to] identify policies and regulations that could be adopted in the near future by such agencies to reduce greenhouse gas emissions."[77] Of all the reporting requirements in our database codified in statutes that mention "greenhouse gas," "climate change," or "global warming," California has 151; Colorado and Washington have over 50; the 19 states with majority Democratic vote share average 32; and the 31 states with majority Republican vote share average 1 to 2. 17 states, including Alabama, Oklahoma, and the Dakotas, have zero such phrases.

Table 1. Partisan Correlations in Policy Domain Allocation.

Report Type	Policy Domain	r	p (adj.)	Direction
All	Housing	+0.71	<0.001	Dem +
All	Government Oversight	−0.55	<0.001	Rep +
All	Budget/Finance	−0.52	<0.001	Rep +
All	Health	+0.48	0.002	Dem +
All	Education	−0.45	0.002	Rep +
All	Environment	+0.41	0.006	Dem +
Recurring	Housing	+0.68	<0.001	Dem +
Recurring	Government Oversight	−0.49	0.002	Rep +
Recurring	Budget/Finance	−0.43	0.007	Rep +
Recurring	Education	−0.43	0.007	Rep +
Recurring	Environment	+0.41	0.007	Dem +
Recurring	Health	+0.36	0.021	Dem +

Notes: Pearson correlations between Democratic two-party vote share (2024 presidential election) and the proportion of each state's reporting requirements allocated to each policy domain. Only significant correlations shown (Benjamini–Hochberg adjusted $p < 0.05$). "Dem +" indicates Democratic-leaning states allocate a larger share to this domain (positive r); "Rep +" indicates Republican-leaning states allocate a larger share (negative r). Correlations reflect proportional allocation, not absolute per-capita requirements.

Republican-leaning states, by contrast, allocate a greater share of reporting requirements to government oversight ($r = -0.55$, $p < 0.001$), budgetary or financial matters ($r = -0.52$, $p < 0.001$) and education ($r = -0.45$, $p = 0.002$). North Dakota requires each executive branch state agency to report to the Office of Management and Budget "a plan to operate the state agency when federal funds are reduced by five percent or more."[78] Kentucky mandates a "compilation of statistical data and other information necessary to assess the effectiveness and efficiency of

captured in part by the subject tags STARA generates for each reporting requirement. *See* WYO. STAT. ANN. § 9-2-2708 (2024).

[77] CONN. GEN. STAT. § 22a-200a (2024).

[78] N.D. CENT CODE § 54-27-27.1.

hearing procedures and recommendations for making improvements to the [administrative hearing] system."[79]

The correlations reflect proportional allocation, aligning with broader ideological differences in policy priorities. These patterns persist for recurring requirements. Again, we supplement our point-in-time analysis with presidential voting patterns from 1988 to 2024, and significant differences persist between consistently Republican and consistently Democratic states (see Appendix Figure 5).

B. Accumulation, Noncompliance, and Opportunities for Reform

Using California as a case study—as it is the only one of our three partner states with accessible information about provision-specific enactment and amendment dates—we show that reporting requirements have expanded over time at an increasingly faster pace. In so doing, we can evaluate the common abundance claim that procedural accretion has worsened since the 1970s, when public interest lawyering became more prevalent.

From fewer than ten requirements in 1940, California's report total has ballooned to approximately 3,800 as of November 2025. This explosion represents more than 400% growth since 2000 alone. Figure 2 displays the cumulative growth of unique statutory reporting requirements in California. Growth remained modest through the mid-1960s, then accelerated: requirements roughly quadrupled from 1970 to 1985 (approximately 60 to 250), nearly tripled again by 2000 (reaching roughly 700), and have since grown another five-fold. 2024 alone saw the enactment of more than 350 legislatively-mandated reports (nearly half of South Dakota's entire count) covering contemporary concerns, including "a comprehensive inventory of all high-risk automated decision systems that have been proposed for use, development, or procurement by, or are being used, developed, or procured by, any state agency."[80] The curve demonstrates sustained expansion with no visible periods of consolidation or elimination. Moreover, this expansion does not directly mirror growth in civil service levels in California (see Appendix E). The trendline for all reports does not account for sunsetted or deleted reporting requirements, but we also observe nearly 400% growth since 2000 for a subset of reports categorized as likely to be currently active as of July 1, 2026, or likely to become so.[81]

[79] KY. REV. STAT. ANN. § 15.111. Democratic and Republican states differ both in overall prevalence and substantive focus of their government oversight-related reporting requirements. For instance, following our approach with climate change mentions: counting the requirements in sections that mention "diversity, equity, and inclusion," "environmental justice," "racial disparities," or "social equity," the 19 states with majority Democratic vote share average 19, and the 31 states with majority Republican vote share average 1.

[80] CAL. GOV'T CODE § 11546.45.5.

[81] During the post-hoc annotation stage of our pipeline, we used a large language model to estimate the active status of each report based on the reporting schedule, frequency, and sunset dates. See Appendix B.5 for additional details.

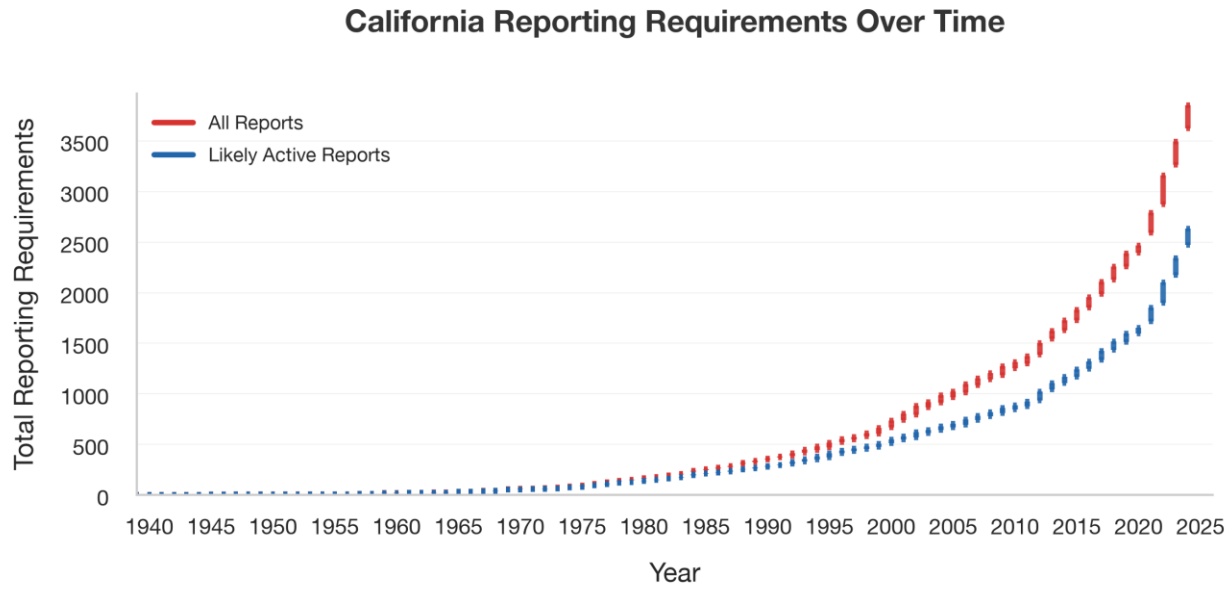

Figure 2. Reporting requirements over time in California's Code (2024). The figure illustrates the substantial growth in reporting requirements over time. The vertical lines account for uncertainty in enactment dates. Because historical time-stamped versions of the California Code are not available, the tabulation of "all reports" does not include reporting requirements that have been previously deleted, but the frequency of such known instances is uncertain.[82] The "likely active reports" subset consists of reports estimated to be currently active as of July 1, 2026, or likely to become so, based on their reporting schedules and sunset dates.

This surge in California reporting requirements reinforces two common arguments in state capacity literature. First, procedural growth tends to be a one-way ratchet. The accumulation reflects the general tendency to "layer on" mandates rather than "excavate and renovate."[83] Second, procedural growth has become more acute in recent decades.[84] We cannot confirm whether hyper-legalization has spurred reporting buildup, as some state capacity scholars might like to believe. But our data do support the general perception that proceduralization today is more extreme than proceduralization of yesteryear.

Moreover, the accumulation of reporting requirements in California appears to be accompanied by noncompliance, suggesting that additional reporting requirements may not provide their purported benefits. Recent journalistic analyses have found that as of February 15, 2024, over 70% of the reports due between February 2023 and February 2024 had not been

[82] Cal. L. Revision Comm'n, Obsolete Reporting Requirements, 33 Cal. L. Revision Comm'n Reports 271 (2003) (noting that "[t]he Legislature occasionally cleans out these type of obsolete provisions").
[83] See Pahlka & Greenway, *supra* note 21, at 25-26.
[84] Gorsuch & Nitze, *supra* note 29.

submitted to the Office of Legislative Counsel,[85] and as of December 11, 2024, 84% of the reports due between January 1st and December 9th of that year had not been filed with the office.[86] We supplement this analysis by taking a longer view across all ongoing, recurring state reporting requirements derived from the statutory codes and documented in the Agency Reports Database. Using STARA-extracted metadata, we estimate that 30% of these reports have never been fulfilled.[87]

These compliance gaps raise fundamental questions about the value of additional reporting obligations. When new agency procedures are proposed, they are often justified in terms of transparency and accountability.[88] Our evidence indicates that, for some reporting requirements, these purported benefits may fail to materialize.

Noncompliance can also reflect internal agency decisions about how to best allocate resources. In Maryland, some agency staff suggested integrating certain requirements into existing reports because they did not have "sufficient funding to support an employee" to comply with the requirements as currently described. Such instances may present opportunities for reform.

Across four Maryland agencies, staff labeled nearly 20% of their combined reports as candidates for elimination or consolidation. At the same time, agency employees underscored reports that continue to serve important functions: presenting unique information not found elsewhere, providing critical details on how funds are utilized, and supporting key government programs. Yet alongside these acknowledged benefits, staff suggested reforming reports with unclear downstream policy impacts, obsolete subject matter, or redundant information in relation to other sources. In the words of a Maryland employee, one such report "technically meets the statute but not the spirit of the law's intent to drive continuous improvement and prevention."

C. Estimated Reporting Costs

[85] Sameea Kamal & Jeremia Kimelman, *Legislators wanted 1,100 reports on how California's laws are working. Most haven't arrived*, CALMATTERS (Feb. 15, 2024), https://calmatters.org/politics/capitol/2024/02/california-laws-are-they-working [https://perma.cc/4RAB-5HS9]. It is unclear whether the reports referenced in this article are only derived from statutory codes or from other sources of authority as well.

[86] Sameea Kamal, *Most reports ordered by California's Legislature this year are shown as missing*, CALMATTERS (Dec. 11, 2024), https://calmatters.org/politics/2024/12/california-new-law-reports [https://perma.cc/4Y84-AQRY]. It is unclear whether the reports referenced in this article are only derived from statutory codes or from other sources of authority as well.

[87] We note that the reports listed in the CA Agency Database are those that the Legislative Counsel Bureau is aware of, but does not include every reporting requirement an agency is subject to. Our noncompliance analysis does not account for reports that may have been completed but not submitted to the Office of Legislative Counsel. Additionally, since the Office of Legislative Counsel removes one-time reports from the CA Agency Database one year after their first due date, we scoped our analysis of noncompliance to ongoing, recurring reporting requirements documented in the database. This approach thus does not incorporate event-driven reports that are overdue but not filed.

[88] *See* SABIN, *supra* note 13, at 76; David Fontana, *Reforming the Administrative Procedure Act: Democracy Index Rulemaking*, 74 FORDHAM L. REV. 81, 91 (2005).

Though many government reports deliver valuable information to the public and policymakers, other reporting requirements can unduly strain staff time and agencies' financial resources. We draw from unique departmental surveys through partnerships with Maryland and California to document variation in the costs imposed on agency staff responsible for preparing these reports. We also estimate the reading burden on legislators in Maryland and the financial implications of reporting requirements at the federal level.

1. Departmental Surveys in Maryland and California

Internal surveys of Maryland and California agencies provide direct information about the cost and impact of reporting requirements. The costs vary widely: Across four agencies in Maryland, staff time needed to fulfill reporting obligations range from a few hours to 1,040 hours every year. Sometimes a single reporting requirement poses variable burdens; one Maryland report was estimated to cost "between $60K and $200K in contractor support and 0.25 to 1 FTE of staff time," depending on the circumstances. For California's Government Operations Agency, costs range from 10 hours to 3,500 hours of staff time per year, and from $102 to $871,700 annually. Reports are also accessed online at vastly different rates. California's FAA Jet Fuel Report takes 22 staff hours and costs $2,251 quarterly, but it is only downloaded five times a year. The annual IT Strategic Plan takes 3,500 staff hours and costs approximately $871,700, but it was downloaded over 31,000 times between January and August 2025 itself. This variation underscores the importance of using cost data to inform the trade-offs involved in carefully reforming reporting obligations, instead of either maintaining or slashing government procedures wholesale.

2. Maryland Legislative Reading Burden

Even when reports are filed, someone must read them for the transparency rationale to hold. Maryland's reporting requirements impose potentially high substantial reading burdens on legislators. In fiscal year 2023, we identified 1,503 reports[89] in the Maryland DLS Library & Information Services online catalog totaling approximately 41,871 pages. The median report contains 10 pages, though comprehensive budget analyses and institutional reviews can exceed 1,700 pages.

What would it take to actually read these materials? Assuming 300 words per page (accounting for charts, tables, and formatting typical of government documents) and applying established reading speed research,[90] we estimate that a comprehensive review of this material would require 140 to 558 hours—or 3.5 to 14 weeks of full-time reading for a single fiscal year's output. Consider what this means in practice. With strategic prioritization, meaningful engagement still requires approximately 5.5 weeks of dedicated reading time—nearly half of

[89] Spot-checking a sample of DLS catalog entries indicates that the discrepancy between the catalog count and our STARA results (n=1,330) is likely attributable to reports mandated by non-statutory sources (*e.g.*, budget committee requests, uncodified session law, and regulations), local government filings, and multiple filings per mandate.
[90] *See* Brysbaert, *supra* note 65.

Maryland's 13-week legislative session. The sheer volume may exceed what any legislator can absorb, undermining the transparency rationale that ostensibly justifies these requirements.

3. Extrapolated Federal Reporting Costs

While rigorous data on the costs of reporting requirements are sparse, we use previously reported data to estimate that recurring federal reporting requirements currently cost $950 million to $2 billion in direct agency costs, or $1.4 billion to $4 billion including administrative overhead.

These estimates extrapolate from historical baselines and are offered as order-of-magnitude. (As we articulate below, providing more grounded estimates for reporting costs is important.) GAO documented that statutory recurring requirements grew from 197 in 1930 to 1,566 in 1980, then doubled to 3,300 by 1986—the fastest growth rate on record.[91] Costs tracked this expansion: recurring requirements cost approximately $47 million in FY 1980 and $240 million by FY 1986, a fivefold increase while requirements merely doubled. Today, we identify 8,652 unique federal reporting requirements, of which 4,638 (53.6%) are recurring[92]—a 41% increase since 1986.

Table 2 presents estimated cost ranges incorporating inflation adjustment, real growth rates to account for increased complexity, and overhead multipliers to capture administrative costs excluded from historical figures. See Appendix G for additional details.

[91] *See* U.S. Gov't Accountability Off., *supra* note 57, at 4.

[92] We applied the same STARA methodology to the United States Code (online ed., accessed 2024) to identify federal reporting requirements. *See* Surani et al., *supra* note 39.

Table 2. Estimated Federal Costs for 4,638 Recurring Reporting Requirements (2024 Dollars).

Extrapolation Method	Cost Per Requirement (2024 $)	Direct Costs	With Overhead (1.5-2× multiplier)	Notes
From FY 1980 baseline	$105,000	$487 million	$731M - $974M	Most conservative; inflation only
From FY 1986 baseline	$204,000	$946 million	$1.42B - $1.89B	More recent baseline; recommended floor
With 1% real annual growth	$297,000	$1.38 billion	$2.07B - $2.76B	Accounts for modest complexity increases
With 2% real annual growth	$434,000	$2.01 billion	$3.02B - $4.02B	Upper bound with significant complexity trend

III. Theoretical Implications: Hidden Trade-offs

The data we have compiled on the accretion, costs, and noncompliance rates of legislatively mandated reporting requirements carry both substantive and procedural implications. Substantively, they show that reporting requirements, while often essential for effective governance, can also be resource-intensive and misaligned with policy priorities, especially when neither benefits nor costs are properly monitored. Procedurally, our dataset lays a foundation for more objective decision-making on administrative procedures—moving debates on reporting requirements from intuition to evidence.

When governments "lack good evidence" about the costs and benefits of administrative procedures, they resort to "the stories we tell ourselves about the state" to justify new policies.[93] Often, these stories center on legitimacy and accountability—"robust procedures . . . are needed to legitimize an administrative state . . . that the public views with suspicion," and, with such procedures, governments can "guard against the risk that influential minorities will wield undue influence over agency action."[94] Absent the evidence we provide, unexamined assumptions will persist.[95]

[93] Bagley, *supra* note 13, at 352.
[94] *Id.* at 369.
[95] *See id.*; Abbe Gluck et al., *Unorthodox Lawmaking, Unorthodox Rulemaking*, 115 COLUM. L. REV. 1789 (2015) (showing that citizens often do not understand government legitimacy in procedural terms); Adrian Vermeule, *What*

Our evidence does not suggest that reporting is uniformly bad. Many reports serve vital functions: they inform budget decisions, satisfy federal funding requirements, and provide data that shapes policy. As one Maryland Department of Natural Resources (DNR) official noted of a forestry report, it "serves as the primary goal setting document for activities of the Maryland Forest Service" and "satisfies US Forest Service requirements, making DNR eligible for certain federal funding." Another official described an interdisciplinary case review as "invaluable." These are real benefits.

But our evidence does suggest that legislatures have systematically failed to reckon with the trade-offs reporting entails. We spell out several critical misconceptions.

A. Reporting Is Not Free

Reporting is often seen as a cheap legislative fix, requiring no additional appropriations. Rarely, if ever, are legislators presented with information on reporting requirements when assessing new policy proposals.[96] In Maryland, fiscal notes, which are intended to assess the fiscal implications of introduced legislation, rarely provide information on reporting costs. When Maryland state representatives voted on the Water Quality Improvement Act of 1998, for example, the personnel costs listed in the bill's fiscal note covered "water quality assessment," "nutrient management planning," and "assistance to local soil conservation districts."[97] Though the bill requires the Maryland Department of Agriculture to report annually on the farm acreage covered by nutrient management plans and the implementation and evaluation of those plans, the fiscal note did not specify how the Department would address this reporting obligation.[98] Reporting costs were effectively erased. Collectively, such erasures can paralyze the bureaucracy.

Reporting can be costly, most notably by commanding the scarce attention of civil servants. Our data reveal dramatic variability in costs. One California report is estimated to consume between *9,571 to 14,291 hours*. Others require fewer efforts. But without accounting for the incremental staff time, agencies are left in a bind. One Maryland official noted that an unfulfilled report "requires 1 additional FTE data staff," a position the agency lacks funding to fill. When staff time flows to reporting, it flows away from other functions. Agencies face a zero-sum trade-off: hours spent compiling reports are hours not spent on service delivery, enforcement, or program administration. As one official put it, the data underlying a required report "is presented in other reports"; the duplicative mandate adds burden without adding value. Another noted that their agency has "several reports on crisis to produce and it would be far more useful to package them into a single emergency and crisis report."

Legitimacy Crisis?, CATO UNBOUND (May 9, 2016), https://www.cato-unbound.org/print-issue/2054 [https://perma.cc/4U3V-JJHU].

[96] We base this claim on our review of fiscal notes for proposed legislation in target states.

[97] Md. Dept. of Leg. Services, HB 502, *Fiscal Note* (1998).

[98] *Id.*

The costs of reporting thus function as an implicit tax on agency capacity—one that legislatures impose unwittingly, without weighing potential harms against envisioned benefits. In practice, each incremental reporting requirement may cause agencies to divert attention away from existing responsibilities (or reports), potentially contributing to noncompliance rates.

B. Reports Are Not Necessarily Read

A common misconception is that any incremental effort at transparency is good. But our evidence shows that many reports may be largely ignored. Neither legislators, oversight bodies, interest groups, nor the public can feasibly pay attention.

1. Public

Start with the general public. When agencies share their work, the public can track how and whether the government is acting on its behalf. But the volume of reporting overestimates interest in the administrative state.[99] As Bruce Cain notes, populist reform often falls short because it "overestimates citizen capacity and commitment" and "ignores that critical role that intermediaries play in any large democracy."[100] So-called "democratic" interventions—whether party primaries or referendums—tend to yield less representative outcomes because, the more niche the political process, the more likely mobilized interest groups are to dominate.[101] A typical citizen is unlikely, for example, to read the 368-page final report from the Maryland Workgroup to Develop Fire Safety Best Practices for Pre-1974 High Rise Apartment Buildings.[102] Nor are California residents interested in the jet fuel tax report, downloaded a total of five times a year.

The specificity of a typical agency report, like an agency notice-and-comment rulemaking, lends itself to specialized interest groups, not general audiences. In fact, business interests submit most public comments.[103] These interest groups have the resources to submit long, technical comments, crowding out less formal comments from lay citizens.[104] As a result, agencies tend to privilege feedback from business associations.[105] Normatively, the outsized

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[99] *See* Cynthia Farina et al., *Knowledge in the People: Rethinking "Value" in Public Rulemaking Participation*, 47 WAKE FOREST L. REV. 101, 103 (2012) (arguing that the form of argumentation in agency rulemaking discourages contributions from lay citizens); Hazel Rosenblum-Sellers, *Good Cause for Goodness' Sake: A New Approach to Notice-and-Comment Rulemaking*, 124 MICH. L. REV. 127, 139 (2025) (noting that interest groups are both more motivated and capable than the general public to engage administrative agencies).

[100] BRUCE CAIN, DEMOCRACY MORE OR LESS 6 (2014).

[101] *Id.*

[102] Md. Workgroup to Develop Fire Safety Best Practices for Pre-1974 High Rise Apartment Buildings, HB 823, *Final Report* (2025).

[103] *See* STEVEN CROLEY, REGULATION AND PUBLIC INTERESTS 132 (2008).

[104] *See* Farina et al., *supra* note 99, at 106-107.

[105] *See* Jason Webb Yackee & Susan Webb Yackee, *A Bias Towards Business? Assessing Interest Group Influence on the U.S. Bureaucracy*, 68 J. POL. 128, 135 (2006).

involvement of affected interest groups is not necessarily good or bad.[106] It simply suggests that, in practice, average citizens are not the primary beneficiaries of good government reforms.[107]

The public's desire for the government is to "[get] its work done."[108] Often, the legitimacy of an agency does not hinge on its strict adherence to procedure.[109] The public instead cares whether an agency is "capable, informed, prompt, responsive, and fair."[110] This impulse undergirds surging advocacy for state capacity and an "abundance agenda."[111] To the extent that administrative procedure directs "agency resources into senseless paperwork," it fails to meet the public's actual needs.[112]

2. Legislators

Though debates about government transparency often revolve around interest groups and the public, on paper, a large share of agency reporting requirements are geared toward the legislature. In Maryland, 74% of reporting requirements identified by STARA require delivery to legislative recipients.

Two conventional narratives explain this dynamic. First, the legislature must ensure that the executive branch is dutifully implementing enacted legislation.[113] Reporting requirements allow legislators to monitor administrative agencies and prevent unlawful activity. Second, the legislature depends on agency reports to pass smarter policy. Legislators cannot be experts on every topic that comes before them.[114] And especially in state governments, where both

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[106] *See* Einer R. Elhauge, *Does Interest Group Theory Justify More Intrusive Judicial Review?*, 101 YALE L.J. 31, 51 (1991).

[107] This dynamic extends across all levels of government, from federal to state to local. Consider, for example, participation in local planning meetings. Studies routinely find that attendees are older, more affluent homeowners (functionally an interest group) intent on limiting development to protect their property values. *See* Katherine Einstein, Maxwell Palmer, and David Glick, *Who Participates in Local Government? Evidence from Meeting Minutes*, 17 PERSP. POL. 28 (2019).

[108] Gluck et al., *supra* note 95, at 1842.

[109] *See* Richard Pildes, *The Neglected Value of Effective Government*, 2023 U. CHI. LEGAL F. 185, 186 (2024) (maintaining that the ability of a government to deliver for its citizens is a "defining feature" of a democracy).

[110] *See* Bagley, *supra* note 13, at 379.

[111] *See* Brink Lindsey, *State Capacity: What Is It, How We Lost It, and How We Get It Back*, NISKANEN CENTER (Nov. 18, 2021), https://www.niskanencenter.org/wp-content/uploads/2021/11/brinkpaper.pdf [https://perma.cc/H8VV-AWZ2] (asserting that "the fortunes of liberal democracy rise and fall with its perceived effectiveness in improving the lives of ordinary people.").

[112] *See* Bagley, *supra* note 13, at 379.

[113] The rise of the major questions doctrine underscores the general belief that, to preserve the separation of powers between the legislative and executive branches, Congress must police agency behavior to ensure that agencies do not engage in legislative activity. *See* West Virginia v. Environmental Protection Agency, 597 U.S. 697, 723 (2022) (Determining that an agency "must point to 'clear congressional authorization' for the power it claims."); Louis Capozzi III, *In Defense of the Major Questions Doctrine*, 100 NOTRE DAME L. REV. 509, 528 (2025) (insisting that agencies can only faithfully execute laws, not create laws).

[114] *See* Richard Hall & Alan Deardorff, *Lobbying as Legislative Subsidy*, 100 AM. POL. SCI. REV. 69, 73 (framing legislators as generalists in need of expert guidance); Marianne Bertrand, Matilde Bombardini & Francesco Trebbi, *Is It Whom You Know or What You Know? An Empirical Assessment of the Lobbying Process*, 104 AM. ECON. REV. 3885, 3886 (characterizing legislators as non-experts).

legislators and the general assembly lack large staffs,[115] representatives and senators need skilled analysis from specialized agencies to diagnose emerging policy challenges.[116]

Putting aside constitutional critiques of the first narrative—which rest on the contested belief that administrative agencies lack legal legitimacy without heightened legislative and judicial oversight—neither explanation aligns with the data we compiled.[117]

Even with the best of intentions, legislators cannot absorb the volume of material agencies produce. In Maryland, a comprehensive review of agency reports in 2023 would have required 3.5 to 14 weeks of full-time reading. The entire Maryland legislative session—jam packed with meetings, press conferences, and hearings—is only 13 weeks. Even if they tried, legislators could not come close to reviewing every legislatively mandated report. This readership gap does not mean that every reporting requirement is useless.

Maryland officials identified multiple reports that specific representatives read with great interest. But the volume, growth, and opacity of existing reports evince a failure to calibrate trade-offs. With weeks-worth of agency reports piling up legislative session after legislative session, states have room to trim reporting requirements without harming substantive policymaking. At the federal level, the problem is sufficiently acute that Congress details agency staffers to help read reports that Congress itself mandates but lacks the capacity to review. The *Washington Post* has described this as a congressional "black hole." "[Y]ou will see people just throwing away just pounds and pounds of reports into the trash," noted one staffer and "we used them as doorstops. Literally."

When reports go unread, errors go undetected. The San Francisco Planning Department's April 2023 Housing Balance Report overstated citywide evictions by roughly 1,600 units—a 40% error.[118] No one noticed. The department itself suspects extremely limited readership for many of its reports. One Maryland agency was blunter: "We are not quite sure if anyone utilizes the report for policy purposes." If all reports are treated as high priority, none are. The sheer volume of mandated reporting risks drowning out the reports that might genuinely inform policy.

Our noncompliance findings—in California, based on the state's Agency Reports Database, about 30% of ongoing, recurring reports may never have been filed—pose yet another narrative puzzle: if these reports were as critical to legislative oversight as often presumed, legislators would have applied sufficient pressure such that agencies meaningfully fixed their compliance rates. But no such correction has occurred in California. Media accounts of legislators expressing frustration over unfiled reports either are few and far between, betray an

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[115] *See The State of State Legislatures*, STATE INNOVATION EXCHANGE (Dec. 1, 2022), https://modernization.stateinnovation.org/state-state-legislatures [https://perma.cc/8MRV-L23J] ("The average member of Congress has eight times as many staff as the average state legislator.").

[116] This narrative was especially prevalent in Maryland, where we heard repeatedly that the Maryland Department of Legislative Services needs agency reports to help legislators understand various policy topics.

[117] *See* Bagley, *supra* note 13, at 374 ("Measured against any theory of constitutional interpretation to which liberals claim fealty…the administrative state's undiminished persistence stands as a convincing refutation of the view that it's somehow constitutionally suspect.").

[118] City & Cnty. of San Francisco, *Planning Commission Resolution No. 21763* 3 (Legistar Docket No. 14504518), https://sfgov.legistar.com/View.ashx?M=F&ID=14504518&GUID=D49FDA94-2B16-4755-8DDF-03D52C3F689E [https://perma.cc/HVR2-FBWR].

actual disregard once journalists are gone, or do reflect concrete corrective efforts behind the scenes, but to no avail. Or, as the *Washington Post* reported about federal practice, "the legislators who pushed for it are gone. . . Congress lost interest. Of the seven committees that still get copies of the report, none reported finding it useful." In the words of former state legislator David Chiu, mandating a report can be a legislative strategy when there is no coalition for enacting substantive legislation. And when the members who care about particular issues depart, these vestigial reports lose their champions and watchdogs, increasing the likelihood that rising rates of noncompliance go undetected and unaddressed. Meanwhile, even unfiled reports may impose lingering costs if they generate recurring uncertainty as to whether an agency needs to prepare a given report or not, or if open reporting noncompliance inadvertently opens the door to agencies interpreting other statutory provisions as merely optional.

3. Interest Groups

Think tanks, trade associations, and lobbyists may utilize reports and act as information intermediaries. Perhaps a report that is downloaded only five times annually is valuable because of how those intermediaries use it. Perhaps journalists will sift through these reports to hold government accountable. Interested in understanding racial disparities in maternal mortality across Maryland? Section 13-1212 of the Maryland General Health Code requires the Secretary of Health to prepare an annual maternal mortality report.[119] Working to advance juvenile justice? Section 9-204 of the Maryland Human Services Code obligates the Secretary of Juvenile Services to annually report recidivism rates of children committed to the Department of Juvenile Services for placement in residential care.[120] For some groups, the data in these reports may prove vital.

Recent efforts by the Trump administration to eliminate or alter public sector datasets have only heightened interest group advocacy for government data access.[121] On April 14, 2025, Public Citizen, joined by the Sierra Club and Union of Concerned Scientists, sued the U.S. Environmental Protection Agency for removing EJScreen and the Climate and Environmental Justice Screening Tool (CEJST), both of which helped NGOs and researchers identify communities disproportionately affected by environmental pollution and climate change.[122] In

[119] MD. GEN. HEALTH CODE §13-1212 (2024).
[120] MD. HUMAN SERVICES Code §9-204 (2024).
[121] Since beginning his second term in 2025, President Trump has ordered the removal or modification of over 8,000 government webpages and 3,000 government datasets. *See* Ethan Singer, *Thousands of Government Webpages Have Been Taken Down Since Friday*, N.Y. TIMES (Feb. 2, 2025), https://www.nytimes.com/2025/02/02/upshot/trump-government-websites-missing-pages.html [https://perma.cc/2NC8-GD3X]; Karen Feldscher, *As Health Data Disappear From Government Websites, Experts Push Back*, HARVARD CHAN SCHOOL OF PUBLIC HEALTH (Feb. 5, 2025), https://hsph.harvard.edu/news/as-health-data-disappear-from-government-websites-experts-push-back [https://perma.cc/5BN8-63GQ].
[122] Complaint at 2, Sierra Club v. Environmental Protection Agency, No. 25-1112 (D.D.C. April 14, 2025).

February 2025, over 230 organizations signed a joint letter asking Congress to restore data removed from federal websites.[123] These coalitions are real, and the data they seek matters.

But the fact that interest groups need government data does not mean they need the current array of mandated reports. When the California Avocado Commission comprises ten avocado producers, four avocado handlers, and a lone public member with the express mandate to market California avocados, interest can quickly resemble protectionism. Whether the California government should employ public resources to mandate a public report from such an entity is at least debatable. Perhaps the annual report provides accountability to prevent capture, but section headers like "trusted, entertaining, and responsive premium brand" of avocados might call that into question.[124]

Here, the evidence from FOIA is also relevant. While designed to boost government transparency, it may functionally operate as "an implicit corporate subsidy."[125] Companies use FOIA to leverage government data for commercial activity. So, perhaps, too for the avocado commission. And because agencies are preoccupied with corporate FOIA requests, they struggle to address requests from news outlets and public interest organizations or to devote time to substantive priorities outside of "information management."[126]

D. Reports Are Not All Equal

Perhaps the most consequential assumption is that reporting requirements are exchangeable—that each mandate represents a considered legislative judgment about the value of the information requested and that there is no tradeoff between reporting requirements. Our data suggest the opposite; reporting requirements vary enormously in their utility, but legislatures lack the information to distinguish essential reports from obsolete or duplicative ones.

Some reports remain genuinely valuable. Maryland officials identified reports that "contain information . . . not available in any other report" and that are "critical to managing" ongoing programs. Others described reports that satisfy federal requirements or serve as foundational planning documents.

But many reports have outlived their purpose: they concern programs that no longer exist or statutes that no longer reflect current policy. "The statute referenced for this report is outdated and does not align with our current climate goals," one agency reported. Another was more direct: "The Residential Heating Oil Tank System Site Rehabilitation Reimbursement Program is

[123] Letter from the Council of Professional Associations on Federal Statistics to Senate Majority Leader John Thune, Speaker of the House Mike Johnson, Senate Minority Leader Charles Schumer, and House Minority Leader Hakeem Jeffries (Feb. 11, 2025).
[124] California Avocado Commission, *2022 Annual Report*, https://www.californiaavocadogrowers.com/sites/default/files/2023-11/2022-CAC-Annual-Report-Final.pdf [https://perma.cc/4HK3-MU9J], at 4.
[125] *See* Bagley, *supra* note 13, at 396.
[126] *Id.*

closed," rendering its reporting requirement moot. A third noted it "would be better to require this report only when a sale or lease occurs or to eliminate it."

Other reports duplicate information already available elsewhere. One official noted that "50% of this information is also on the annual [Managing for Results] report." Another observed that "the State reporting is redundant with the federal Chesapeake Bay Program reporting and the State serves as a pass through for this information. It is more efficient to go directly to the federal report." A third noted that a required report "is duplicative with the purpose of the Maryland Report Card website."

Without systematic information about which reports exist, let alone serve ongoing functions, legislatures cannot make rational decisions about reporting policy. They add new requirements without knowing the cumulative burden, and they rarely revisit old ones. The result is a thicket of mandates in which vital reports compete for attention with obsolete ones, and agencies—lacking clear signals about legislative priorities—must guess which obligations to fulfill.

E. Reports Are Not the Only Option

Even where interest groups do rely on government data, static written reports—physically delivered to legislative chambers—may not always be the most effective mechanism. Physical, sporadic paper copies can impede the kind of analysis that yields real oversight, making it challenging for interested parties to understand trends and patterns. As tools like CEJST show, administrative agencies can package datasets in dynamic, interactive digital dashboards. Congress embraced this alternative approach in 2018 when it passed the OPEN Government Data Act.[127] The Act, which codified Data.gov in statute, requires federal agencies to publish their information on the site in standardized, machine-readable formats.[128] Sixteen states have passed comparable legislation, while 46 states maintain some form of open-data portal.[129]

The rise of open-data infrastructure reduces the justification for many legislatively mandated reports. In states with open-data portals, interest groups can obtain identical information more directly from data dashboards. Trimming existing reporting requirements, then, does not necessarily mean creating an informational void—it can mean reducing duplicative agency work while improving data accessibility for the groups that actually use it. To understand the volume of licensing actions over time, an investigator would need to track down written reports, extract the relevant information, and compile into a table. This is what dashboards are for. Our findings here dovetail with recent work on information disclosure, which

[127] OPEN GOVERNMENT DATA ACT, 44 U.S.C. §§ 3501-3511 (2018).
[128] *Id.*
[129] *See State Open Data Laws and Policies*, NATIONAL CONFERENCE OF STATE LEGISLATURES (Jan. 25, 2022), https://www.ncsl.org/technology-and-communication/state-open-data-laws-and-policies [https://perma.cc/8APS-ME3W].

have emphasized that wholesale microdata disclosures can be more important than retail level disclosures that put the onus on individual consumers to read and comprehend.[130]

F. Toward a More Honest Accounting of Abundance

Our findings do not support the conclusion that reporting requirements should be eliminated wholesale. They support a more modest but urgent claim: policymakers must grapple with trade-offs. Reporting imposes real costs on agencies—costs that are rarely estimated, disclosed, or debated. Reports can go unread, sometimes unproduced, sometimes duplicatively produced, and occasionally unnoticed even when they contain significant errors. Legislatures lose sight, with the U.S. Congress losing track of over 5,000 *existing* reporting obligations.[131] At the same time, many reports are deemed essential by both their authors and recipients towards achieving concrete policy goals and preserving fundamental social values. But without data, policymakers cannot tell the difference.

So too with abundance. Without an honest accounting of the source, rationale, and extent of existing processes, anti-proceduralist complaints lodge without exception. Undifferentiated calls to cut process risk undermining the abundance project. What values are procedures meant to preserve? What meta-process should be undertaken in the project of de-proceduralization? Where is there room for consultation, input, and weighing of tradeoffs? What reports should be gotten rid of? How can abundance proponents articulate a vision for cutting red tape that preserves a vision for governance and state capacity, rather than converging on pure deregulation? Our evidence, the agency voices we have surfaced, and the demonstration projects with California, Maryland, and New York offer a foundation for a more honest accounting. Statutory research tools like the one we've offered promise to fill a fundamental information gap. But a systematic assessment also frames reporting not as an unalloyed good, as it may seem from the vantage point of the legislative floor, nor as an unsalvageable bad, as it may seem from the pages of anti-proceduralist discourse, but instead as a tool with both benefits and costs that can be weighed with increasing tact and nuance through fixes we propose below.

IV. Pathways for Reform

How can we address the *Washington Post*'s legislative black hole? Fixing the pathologies that we have documented will not happen naturally. Legislators have a structural incentive to pass new laws, which allows them to signal progress to their constituents.[132] This incentive

[130] *See* Daniel E. Ho, *Fudging the Nudge: Information Disclosure and Restaurant Grading*, 122 YALE L.J. 574 (2012).
[131] *See* Surani et al., *supra* note 39.
[132] *See* Gabriele Gratton et al., *From Weber to Kafka: Political Instability and the Overproduction of Laws*, 111 AM. ECON. REV. 2964, 2965 (2021) (arguing that, when a politician passes a law, she "would like voters to believe that she is a competent, skillful reformer."); Tommaso Giommoni, Massimo Morelli & M. Daniele Paserman, *Signaling Incentives and the Quality of Legislation: A Text and Network Analysis of the U.S. Congress* (The Wallis Institute Annual Conference, 2022), https://www.wallis.rochester.edu/assets/pdf/conference29/signaling-incentives-and-

drives long-term policy accretion, especially as the American public turns increasingly to formalistic laws rather than civic institutions and social norms to address social problems.[133] As Justice Gorsuch has noted, the length of the U.S. code has ballooned over the last 100 years from a single volume to 54 volumes spanning 60,000 pages.[134] Reporting requirements are especially prone to such accretion: they are easier to pass than substantive legislation but still help elected officials demonstrate concern about specific policy issues.

Once enacted, reporting requirements stick around, and code cleanup efforts have been difficult to undertake, precisely because Congress and agencies can lose track. Because the benefits of streamlining old laws are diffuse and difficult to quantify, reporting requirements—even when outdated—"sit on the books for decades, sapping public time and resources."[135] The statutory search pipeline we have developed can go a long way to systematically surfacing reporting requirements, but based on our experience working with California, Maryland, and New York, we propose a simple set of interventions to enable a more rational balancing of values and tradeoffs, enhance oversight, and reduce unnecessary burdens on the bureaucracy. Our proposed model legislation can be found in Appendix A.

A. Policy Solutions

1. Sunset Provisions

Reporting requirements tend to be most valuable shortly after enactment. Perhaps they address a time-sensitive policy issue for which the legislature needs better data. Perhaps they allow the legislature to track the implementation of a new government program. Perhaps they reflect the efforts of a specific legislator who wanted to raise the profile of a niche, specific pet project. Over time, these benefits dwindle: the once-timely issue becomes old news, the government program achieves steady operations, the representative who championed the report retires. Yet, reporting requirements persist, creating a potentially enormous cumulative burden.

To address the declining utility and increasing cumulative costs of reporting obligations, legislatures should ensure that all reporting obligations have a default sunset date in the future (*e.g.*, 5 years after passage). The legislature can deviate from the sunsetting standard where needed or reauthorize the reporting obligation prior to its termination. But by default, reporting obligations should include sunset dates. Shifting the status quo can help ensure that only cost-justified reporting requirements stay on the books.

2. Expiration Provisions

quality-of-legislation.pdf [https://perma.cc/FKX4-FL8E] (emphasizing "signaling" as a key motivator for new legislation).

[133] *See* NEIL GORSUCH, OVERRULED: THE HUMAN TOLL OF TOO MUCH LAW 9 (2024).

[134] Gorsuch & Nitze, *supra* note 29.

[135] Nicholas Bagley, *Using Artificial Intelligence to Build State Capacity*, SUBSTACK (June 9, 2025), https://blog.dividedargument.com/p/using-artificial-intelligence-to [https://perma.cc/8ZHY-NW9W].

A substantial number of reporting obligations stem from the fact that programs have changed or lapsed. The Federal Reserve, for instance, is required to issue an annual report about the Presidential Dollar Coin program. The program ceased to exist in 2012.[136] Yet each year to present day, the Federal Reserve continues to issue this report even though Fed leadership and staff have "not received any questions or inquiries on this topic."[137]

This does not have to be so. Reporting requirements should presumptively terminate with the underlying program. The Federal Reserve grapples with immense issues of monetary policy; consuming staff time – however little – to report annually on a nonexistent program detracts from more important priorities. Automatic expiration is a simple step to recalibrate reporting costs and benefits.

3. Cost Estimates

As previously mentioned, legislators typically lack information about reporting costs when evaluating proposed legislation. STARA-like analysis can help states capture existing reporting burdens, but to prevent the problem from growing, legislators should understand the potential costs of future reporting before creating new reporting obligations.

For every bill that would create a new reporting requirement, legislative staff should include a reporting cost estimate in the bill's fiscal note. The estimate need not be precise. False precision could itself become a reporting burden for departments of legislative services. Instead, legislative staff should estimate the number of full-time employees (FTE) needed to produce the proposed report. Through our engagements with California and Maryland, we found that agencies are already more inclined to conceptualize reporting burdens in terms of FTEs. An FTE estimate alone would provide legislators with significantly more reporting cost data than they currently possess.

Similarly, for each completed report, agencies should provide simple cost estimates, just as they provided for us in our surveys with California and Maryland agencies. This would provide meaningful estimates to assess when a reporting obligation has grown out of proportion.

4. Digital Report Repository

We found that one of the most vexing challenges is determining which reports have actually been written. States should create public digital repositories of all reports, which can help inform the relevance and impact of such requirements. If an agency has not published an annual report for multiple consecutive years, the agency has likely determined that continuing to produce the report is not worthwhile or that failing to publish the report will not upset the legislature, interest groups, or the general public. Download statistics, such as the ones we collected, help to capture the volume of public interest. A report that results in five downloads to the cost of $120k is presumptively different from a report that results in 75k downloads for $5k.

[136] Federal Reserve Board, *Report to Congress: Presidential $1 Coin Program* (2012).
[137] Federal Reserve Board, *Report to Congress: Presidential $1 Coin Program* (2024).

Here, the federal government provides an instructive example. In 2022, Congress passed the Access to Congressionally Mandated Reports Act, which requires agencies to post all legislatively mandated reports on GovInfo.[138] This digital report repository has helped reveal that fewer than 10% of congressionally required reports appear to be published, although measuring compliance is complicated.[139] States should enact similar legislation to enable better compliance tracking, with sufficient meta-data to identify the reporting agency, the relevant statute, and overall report downloads. California and Maryland have both passed legislation in this vein, though in Maryland, available meta-data varies by report.[140]

5. Unique Report Identifiers

Assigning unique digital identifiers to legislatively mandated reports would also help legislators track the utility of reports over time. With a unique identifier like a Digital Object Identifier, legislators could determine the number of report citations in the legislative record, newspaper mentions, or other media coverage to understand the impact and relevance of a report. Every datapoint captured would help fill the information gap that continues to plague cost-benefit analysis for administrative procedures.[141]

6. Conversion to Dashboards and Performance Reporting

Many reporting obligations were enacted before digital democracy. Written reports that primarily convey numeric data can be substantially more helpful if converted into public databases or digital performance dashboards. Take the Maryland DNR's annual report on state tree expert licensing.[142] The report consists solely of quantitative metrics with no accompanying narrative. Instead of preparing a static, written report every year, DNR could create a live data dashboard that displays tree expert licensing in real time. This dynamic setup would provide more value to stakeholders interested in the underlying data. It would also save DNR the time and money spent preparing the written report, finalizing the accompanying cover letter, and delivering physical copies of the report to DLS.[143]

Federal and state open-data laws have laid a foundation for greater adoption of data dashboards. In Maryland, the state Higher Education Commission, Department of Public Safety and Correctional Services, and Department of Transportation, among other agencies, have established dashboards for key performance metrics. Allowing agencies to discontinue written

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[138] ACCESS TO CONGRESSIONALLY MANDATED REPORTS ACT, Pub. L. No. 117-263, §§ 7241-7248 (2022).
[139] Lindsey Gailmard and Daniel E. Ho, *When Do Statutes Bind? Rethinking Congressional Control of the Bureaucracy* (unpublished manuscript).
[140] *See* CAL. GOV. CODE § 9795 (2024); MD. GOV. CODE § 2-1257 (2024).
[141] Maryland has prototyped Maryland State Agency Report numbers, but these numbers are not consistently assigned. To effectively compare the utility of multiple reports, states should implement digital identifiers universally.
[142] Md. Department of Natural Resources, Natural Resources Article § 5-419(c), *State Tree Expert Licensing Annual Report* (2024).
[143] *See* MD. GOV. CODE § 2-1257 (2024) (requiring agencies to deliver five printed copies of every final report intended for the General Assembly to the Department of Legislative Services)

reports for which dashboards exist would help reduce redundant work and incentivize a shift to more modern, accessible information tracking.

B. The Limits of Codification

Our systematic search for reporting requirements across fifty states also points to a potential direction forward in the codification movement. As originally envisioned, the codification of laws was aimed to make law *legible*.[144] Yet we find this project is surprisingly incomplete at the state level.

First, we find a surprising number of instances where the codification process remains opaque. Although "session laws" are traditionally understood to be of temporary nature and codification signals permanence, we found significant variation in implementation across states. Pennsylvania's Public School Code of 1949 covers areas of education law distinct from the state's Title 24 on Education, but has never been fully adopted into Pennsylvania Consolidated Statutes, all the while maintaining the binding force of law, as fortified by eleven separate amendments—also only available as unconsolidated Acts. Similarly, North Carolina's lapsed session laws—despite no operative legal force—contain numerous reporting requirements that are treated as binding law by state agencies. This makes searching for and understanding state law profoundly challenging. The scattershot nature of state codification manifests itself in any attempt to systematically understand provisions. In Pennsylvania, we extracted numerous "unconsolidated statutes," but such sources lack the kind of organization of codified statutes, potentially leading to worse performance by STARA (or any human effort) in understanding statutory law.

Second, even when codified, the availability, format, and structure of state codes impedes legibility. At the federal level, substantial digital efforts transformed the U.S. Code into standardized, machine readable (XML) format, allowing for systematic analysis over the existing code and over time.[145] Virtually no state provides comparable digital code. Even worse, prior versions of the state code—critical for understanding legislative changes—are often exclusively available by private vendors. A central part of public law, then, is private. The lack of structured information again makes understanding state law challenging. Our efforts required months of processing to consistently ingest diverse forms of state codes, but even this remains limited. Our statutory search operates at the section level, for instance, with the assumption that sections look relatively similar across all 500 million words of state codes. But statutory codes are organized

[144] For an account of statutes and the U.S. Code, see Peggy Roebuck Jarrett, *Public Laws and the U.S. Code*, *in* FUNDAMENTALS OF U.S. GOVERNMENT: MINING, FINDING, EVALUATING, AND USING GOVERNMENT RESOURCES (Cassandra J. Hartnett, Andrea L. Sevetson & Eric J. Forte eds. 2d ed. 2016). There are, of course, numerous critiques of whether codification achieves its intended aims. *See, e.g.*, Andrew P. Morriss, *This State Will Soon Have Plenty of Laws - Lessons from One Hundred Years of Codification in Montana*, 56 MONT. L. REV. 359 (1995); Dru Stevenson, *Costs of Codification*, 2014 U. ILL. L. REV. 1129.

[145] *See, e.g.*, Dawoon Jeong et al., *A Dataset Showing a Century of Evolution in the Complexity of the United States Legal Code*, 13 SCI. DATA 1 (2026).

with dizzying levels of conceptual disaggregation. For example, Section 27-19-56 of the Mississippi State Code, on special motor vehicle license tags or plates, is followed by "subsections" enumerated from 27-19-56.1 to 27-19-56.559 which detail boilerplate provisions explicitly for every specialty group, from elected officials and Purple Heart recipients to supporters of hundreds of individually listed nonprofit organizations and public schools.

Third, numerous state codes incorporate *private standards*, and copyright of such standards can seriously impede the aims of codification and abundance. Housing, for instance, is an area of immense focus in recent political focus on affordability, but many building codes are ostensibly private, despite governing as public law.[146] In *ICC v. Upcodes*, one district court invalidated claims of copyright,[147] but the recent Pro Codes Act attempts to statutorily recognize such claims of copyright, while making the standard publicly accessible online.[148] Our evidence suggests that if the codification movement aims to make law legible, the next frontier also requires the ability to ingest, process, and search all standards through advanced technology. Copyrighted standards in public law erode the ability, for instance, to employ public AI tools to study ways to streamline and rationally de-proceduralize. Private codes may hence further incapacitate the state.

Fourth, the failure to clean up reporting relics can directly undermine legal legibility. Numerous reporting requirements are defunct. In New York, the state code still formally requires the Board of Regents to file an annual report on measures taken to enforce laws against "subversive" public school teachers.[149] The problem? This reporting requirement dates back to the Red Scare and was found unconstitutional by the U.S. Supreme Court in 1967.[150] Without proper accounting, codification may undermine, rather than improve, legibility.

Last, even when codification is complete and public in principle, *search* remains private in practice. Lexis and Westlaw have, of course, dominated as search platforms for law, but such platforms either require users to craft manual searches (with no API access) or provision limited AI-based search. Statutory research engines like STARA, however, point to a fundamentally different future of *public search*. Existing AI functionality remains extremely limited on existing services. One audit found that AI services on Lexis and Westlaw hallucinated in between one fifth to one third of benchmark queries, including citations to nonexistent statutory provisions, despite promising "hallucination free" citations.[151] These findings extend to promised capacities for AI jurisdictional (50 state) surveys.[152] For scans like the ones we developed, the computational cost of AI-based search structurally limits the ability of such systems to return comprehensive results. In one search, for instance, Westlaw hallucinated 121 statutory

[146] *See* CONG. RSCH. SERV., R47656, COPYRIGHT IN STANDARDS INCORPORATED BY REFERENCE INTO LAW AND THE PRO CODES ACT. (2025).
[147] Int'l Code Council, Inc. v. UpCodes, Inc. No. 17 CIV. 6261, 2020 WL 2750636 at 4 (S.D.N.Y. May 27, 2020).
[148] H.R. 4009, 119th Cong. (2025).
[149] N.Y. EDUC. LAW § 3022 (2024).
[150] Keyishian v. Board of Regents, 385 U.S. 589 (1967).
[151] *See* Varun Magesh et al., *Hallucination-Free? Assessing the Reliability of Leading AI Legal Research Tools*, 22 J. EMPIRICAL LEGAL STUD. 216 (2025).
[152] *See* Afane et al., *supra* note 61.

provisions, comprising more than half of the results.[153] This is particularly pernicious when comparisons of procedural complexity across jurisdictions provide an important path for potential simplification.[154]

Justice Gorsuch and abundance theorists share one complaint: there is simply "too much law." As we have shown, emerging AI tools can potentially revolutionize the legibility of law, but also points to just how incomplete, inconsistent, and privatized codification can be, all of which are limitations that are ripe for state-led reform.

V. Conclusion

In his 2005 commencement address at Kenyon College, writer David Foster Wallace opened with a story: "There are these two young fish swimming along, and they happen to meet an older fish swimming the other way, who nods at them and says 'Morning, boys. How's the water?' And the two young fish swim on for a bit, and then eventually one of them looks over at the other and goes, 'What the hell is water?'"[155]

Administrative processes like reporting requirements have long been the water of administrative agencies, an unquestioned dimension of government work. Civil servants swim through them daily: compiling data, drafting summaries, submitting reports to legislators who may never read them. The obligations accumulate session after session, and because each individual mandate seems modest and well-intentioned, no one stops to ask how the water has changed.

This Article has tried to see the water clearly. Fukuyama asked why government doesn't work; abundance advocates like Klein and Thompson urged a focus on outcomes over process; Mamdani warned that public inefficiency fuels arguments against the public sector itself; and Justice Gorsuch describes rule of law run amok amongst too many laws. We explore the reporting landscape, not as the whole of procedural accretion, but as a revealing specimen of it—ubiquitous, measurable, and largely invisible until now.

What we found confirms the abundance theorists' intuition but complicates the narrative. Yes, reporting requirements correlate with Democratic vote share; as such, our analysis contributes to contemporary discussions on the implications of accumulating procedures, especially in Democratic states, for state capacity.[156] But partisanship explains only a fraction of the variation; the thicket is perhaps better thought of as bipartisan. As reports have proliferated nationwide, aspirational transparency risks becoming practical incapacity on both sides of the aisle.

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[153] *See* Frequently Asked Questions, STARA, https://reglab.github.io/stara/faq.html (Feb. 8, 2026).
[154] *See* Emaan Hariri & Daniel E. Ho, *AI for Statutory Simplification: A Comprehensive State Legal Corpus and Labor Benchmark*, *in* PROCEEDINGS OF THE TWENTIETH INTERNATIONAL CONFERENCE ON ARTIFICIAL INTELLIGENCE AND LAW (2025), *available at* https://arxiv.org/pdf/2508.19365.
[155] David Foster Wallace, *Commencement Address at Kenyon College* (May 21, 2005).
[156] *See generally* KLEIN & THOMPSON, *supra* note 11.

Our findings also reveal another nuance that the abundance critique sometimes obscures: the system is not monolithic. The challenge is not that reporting is uniformly bad, but that legislatures have lacked the tools to tell the difference.

We have offered tools and an approach to grapple with this problem of abundance. As the U.S. Code and state legal codes swell to hundreds of millions of words, determining agencies' statutory obligations becomes more challenging.[157] With STARA, we can aggregate reporting mandates across disparate statutes to understand agencies' full reporting burden for every state—a comprehensive sweep that would be impracticable without the assistance of large language models. Our collaborations with California, Maryland, and New York allowed us to refine an AI-assisted search across all fifty states—and, crucially, to access the perspectives of the civil servants who actually produce and read the reports. Their voices revealed what no statutory text could: which reports inform real decisions, which gather dust, and which concern programs that closed years ago.

By combining cross-state statistical analyses with single-state noncompliance and cost estimates, we begin to address a persistent problem with an achievable framework for reform. The absence of reliable data makes it easier to overweight the intended benefits of an administrative procedure than to adjudicate the necessary trade-offs in practice. Better information cannot resolve the tension between efficiency and accountability—that tension is inherent to democratic governance. But it can ensure the legislatures confront the trade-offs rather than ignore them.

We release a public website of reporting requirements across the 50 states and hope that this will provide a starting point to prioritize which reports matter most. And our model legislation offers a sustainable path forward: sunset clauses, cost estimates, digital repositories, and open-data alternatives.

None of this will, by itself, rebuild the high-speed rail or close the housing deficit. But it addresses something foundational: the cumulative burden that diverts agency capacity from outcomes to compliance. Assembling the evidence base for effective public administration, one procedure at a time, can ultimately mean the difference between a state that harnesses its precious capacity to deliver on outcomes—and one that fails to do so.

[157] *See* Gorsuch & Nitze, *supra* note 29 (highlighting the proliferation of federal and state laws).

Appendix

A. Model Legislation: Streamlining Administrative Reporting Act (SARA)

FOR the purpose of improving the efficiency, transparency, and usefulness of agency reporting by establishing standardized practices for the creation, maintenance, tracking, and expiration of legislatively mandated reporting requirements.

BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF _____:

Section 1. Definitions.
In this act:

> **"Agency"** means any department, office, board, commission, or other entity within the executive branch of state government.
>
> **"Report"** means any statutorily mandated written submission, study, or compilation of information required to be produced by an agency and submitted to the legislature, the governor, or the public.
>
> **"Reporting requirement"** means any statutory provision requiring an agency to produce a report.
>
> **"Program"** means any statutory or administratively created activity, initiative, or operation administered by an agency.
>
> **"Designated state entity"** means the [Office of _____ / Department of Administration], which is responsible for administering the digital repository under Section 5 and the unique report identifier system under Section 6.
>
> **"Program termination," "terminated program,"** or **"cessation of a program"** means the repeal of the program's statutory authorization, the expiration of the program under its own terms, or the permanent discontinuation of the program's operations and funding. A temporary lapse in appropriations, a reorganization that continues the program's functions, or a period of dormancy is not a cessation.
>
> **"Digital repository"** means a centralized, publicly accessible electronic system for storing and accessing agency reports.
>
> **"Performance dashboard"** means an automated, continuously updated digital display of program metrics and outcomes.

Section 2. Default Sunset of Reporting Requirements.
(a) Except as otherwise provided by law, any reporting requirement enacted on or after the effective date of this Act by the legislature expires five years after the date of enactment of the

law establishing the requirement.

(b) The legislature may:
(1) specify a different sunset period for a particular reporting requirement or category of reports; or
(2) reauthorize a reporting requirement before its expiration.

(c) A reporting requirement not reauthorized before expiration lapses and is no longer binding on the agency.

(d) Federal carve-out. This section does not apply to a reporting requirement to the extent the report is required by federal law or as a condition of receiving federal funds.

(e) Constitutional requirements. This section does not apply to a reporting requirement imposed by the Constitution of this State.

Section 3. Expiration of Reporting Requirements for Terminated Programs.
(a) A reporting requirement tied to a program terminates upon cessation of the program, as defined in Section 1.

(b) Each agency shall issue a final report for a program that is terminated if the program was subject to a reporting requirement.

(c) Upon issuance of the final report, the associated reporting requirement is deemed satisfied and expires.

Section 4. Cost Estimates for New Reporting Requirements.
(a) A bill that creates a new reporting requirement must include an estimate of the resources required to produce the report.

(b) Each agency subject to the reporting requirement shall update the estimate annually.

(c) The estimate must include, to the extent practicable:
(1) estimated staff time, including full-time equivalent personnel; and
(2) estimated budgetary costs.

(d) Estimates under this section may be approximate and are not required to meet a standard of precision that would impose a material additional reporting burden.

Section 5. Digital Repository of Reports.
(a) The [designated state entity] shall establish and maintain a digital repository for all reports required by statute.

(b) The repository must:
(1) provide public access to all reports, except for those made confidential by law, in an electronic, machine-readable, and downloadable format;
(2) include metadata identifying the issuing agency, statutory authority, and date of

publication;
(3) track report access and downloads in a de-identified manner; and
(4) allow search and retrieval by relevant categories.

(c) Agencies shall submit required reports to the repository in accordance with standards established by the [designated state entity].

Section 6. Unique Report Identifiers.
(a) Each statutorily required report must be assigned a unique report identifier.

(b) The identifier must:
(1) be standardized across agencies; and
(2) enable persistent identification and retrieval.

(c) The [designated state entity] shall administer the system for assigning and maintaining identifiers.

Section 7. Transition to Performance Reporting.
(a) An agency may replace a written report with a performance dashboard if the dashboard provides substantially equivalent or improved public access to relevant information.

(b) An agency may discontinue a written report if:
(1) a performance dashboard fulfills the informational purpose of the report; and
(2) the dashboard is publicly accessible and maintained in a current and accurate manner.

(c) The legislature may require continued written reporting notwithstanding subsection (b) by expressly stating such requirement.

Section 8. Effective Date.
AND BE IT FURTHER ENACTED, That this Act shall take effect [insert date].

B. STARA Search Methodology

B.1 Corpus Assembly. We collected statutory codes across all 50 states. We used the 2024 versions of statutory codes for all states, with the following exceptions. For Oregon, we collected the 2023 Codes since the 2024 Codes were not available at the time of ingest; for North Dakota, we collected a version of the statutory code that is current as of January 1, 2024; and for Massachusetts, Kentucky, and Illinois, we collected versions of the statutory codes that are current as of January 1, 2025. All state codes were ingested at the section level, with the exception of Unconsolidated Statutes in states like New York and Pennsylvania. Those Unconsolidated Statutes were structured such that multiple sections were aggregated within a single provision. Additionally, the Unconsolidated Statutes may lead to some duplicate results via amendments of Consolidated Statutes.

B.2 Keyword Pre-Filter. We pre-filtered statutory provisions using regular expression matching, flagging provisions containing any of the following terms: "submit," "transmit," "report," "file," "audit," "assess," "notif," "plan," "strategy," "brief," "study," "studi," "summar," "compil," "publish," or "evaluat."

B.3 Classification Criteria. The language model evaluated each pre-filtered provision against three criteria:

> *(1)* The provision must require the submission of a formal, substantive written report of non-negligible length, in contrast to information sharing as part of standard administrative procedures or other informal notifications;
> *(2)* The submitting entity must be a member of the executive branch of the state government (excluding judicial, legislative, local, and private entities).
> *(3)* The report must be submitted to a state-level legislative or executive branch entity, or required to be publicly disclosed (excluding judicial and private recipients).

All three criteria must be met for a provision to pass through this stage. For example, Section 42.0174 in Kentucky Revised Statutes states that "The Office of Policy and Audit shall be headed by an executive director who shall be appointed in accordance with KRS 12.050 and shall report to the secretary." A naïve keyword-based search may flag this provision as having to do with a report, and the potential submitter and receiver appear to be valid entities, but STARA determines through semantic context that this "report" does not constitute a formal, written document, thereby failing criterion *(1)*. Section 279.68 in Iowa Statutes provides that school districts must "[r]eport to the department of education the specific intensive reading interventions and supports implemented by the school district"; STARA determines that criteria *(1)* and *(3)* are met, but not *(2)*, because the submitters are local government entities. Section 1-339.63 in North Carolina General Statutes requires that "the sheriff shall, within five days after the date of the sale [of personal property per civil judgment], file a report thereof with the clerk of the superior court," but STARA flags the clerk as a judicial recipient, thereby failing *(3)*.

STARA is primarily designed to flag a given provision as relevant or not, but we provided additional instructions for the model to extract multiple reports within a given provision as needed. However, the results for multiple reports within a section may have more variation as a result.

B.4 Extracted Fields. For each identified provision, STARA extracted 15 structured fields including: a brief description of the report and its required contents, sender and recipient entities, policy domain, reporting frequency, schedule, sunset provisions, enactment and amendment date information, and statutory references.

B.5. Post-hoc Annotation. We used a large language model to help annotate the results based on metadata extracted by STARA, to facilitate review by state partners. The resulting dataset provides initial estimates of the agency that is likely responsible for compiling the report (based on information like the senders and the location of the provision in the statutory code); whether the report appears to be active or not as of July 1, 2026, onwards (depending on the reporting schedule, frequency, and sunset date); and the type of recipient (executive, legislative, or the public). We note that our metadata extraction and post-hoc annotation are derived from one statutory section at a time. For example, if a reporting requirement in one statutory section was repealed in a different statutory section, our current methodology would not capture this subsequent information in the report's sunset date or active status fields.

C. Validation

Our partnerships with California's GovOps, the Maryland Governor's Office, and the New York Governor's Office revealed that agencies may navigate the precision−recall tradeoff differently: preferring review of a more limited set of results each with a higher likelihood of being deemed true reporting requirements, versus preferring review of a more expansive set of results with a higher likelihood of capturing all actual reporting requirements. While some of these differences may be driven by questions of capacity, our interactions with agency staff also revealed substantial differences in what *definitionally* constituted a reporting requirement, for the purposes of reform-oriented attention. As such, validation posed a unique challenge, given that our dataset ultimately empowers agencies to apply various filters according to their distinct definitions for what constitutes a reporting requirement of interest. As we iterated extensively with our collaborators to understand these nuances and explored different variations to our STARA workflow, including upstream keyword filters, LLM prompt refinement, and ex post categorization, we also ended up with multiple forms of validation that built our collective confidence in the multifaceted utility of our compilation.

C.1 Matching to existing databases. First, we worked with CA GovOps to leverage their existing CA Agency Reports portal, a centralized database tracking reports submitted by state agencies to the legislature and other entities, to validate our STARA pipeline. Critically, this portal was confirmed by our agency partner to be incomplete, meaning it could not be utilized to test precision. That being said, it is a uniquely voluminous database of agency-verified reports that can be individually linked by statutory section to our STARA outputs, rendering it our most robust test for recall, provided that recall optimization is desired by an agency, and that an agency's definition of reports is similar to California's.

We scraped the portal in August 2025, yielding 2,124 reports derived from statutory codes, and matched our STARA search results from California to the database using fuzzy matching by citation.[1] We first determined that statutory sections for 77 of the reports were not present in the 2024 California Codes on Justia, our primary source, rendering them out of scope for STARA's review. Next, we identified 216 reports that STARA correctly excluded because the submitting entity was either local, judicial, legislative, or private. We specifically scoped our prompt to exclude these categories since GovOps (and other agency partners) preferred that our operative definition of reports within the STARA pipeline focus on state-level executive government senders. Out of the remaining 1,831 reports which we determined to be ground truth positives for the purposes of STARA recall evaluation, 27 were missed by our keyword filter. We manually reviewed the remaining 115 reports in the Agency Reports portal that STARA flagged as negative. The primary source of the discrepancy revolved around the definition of report; we had tightened our prompt based on feedback from partners that earlier versions of our searches were capturing standard administrative procedure rather than substantive reporting requirements, which then would cause agency staff to wade through several entries in our dataset that were

[1] We matched the California portal to the STARA results by citation, but we use reports as our unit of analysis. This approach is limited by factors such as the different ways the two databases are organized – for example, the California portal disaggregates reports by sender, while the STARA results do not.

ultimately not relevant to their task. Other discrepancies arose from the state-level sender criterion. Edge cases included reports completed by a third party but overseen or submitted by a state executive entity, as well as quasi-governmental entities like the California Life and Health Insurance Guarantee Association. Under the assumption that all 115 of these reports were true errors, then STARA potentially missed 115 + 27 = 142 reports due to design decisions in the keyword filter and prompt. The resulting recall calculation is (1,831 reviewable reports – 142 potentially missed reports) / 1,831 = 92.2%.

We also experimented with a far broader prompt, featuring an expanded keyword filter and a more relaxed definition of reporting requirement that included: data submissions, routine administrative reporting, and formal information sharing; executive, legislative, and local senders; and local as well as state-level recipients. After removing the 77 reports that were not in the 2024 California Codes on Justia, as well as 58 reports that STARA correctly identified as having judicial or private entities as senders, we determined that STARA captured (1,989 – 57) / 1,989 = 97.1% of the California Agency Database. However, the total number of positive results with this broader prompt ballooned to over 14,000 potential reports; many provisions referenced routine information sharing that would not meet a traditional definition of "reporting requirement" and risked burdening our partners with an overly inclusive set of results. Rather than purely optimize for higher recall, we therefore decided to balance precision and recall in our 50-state run in order to provide agencies with a manageable dataset of reports that would be most relevant to them as a starting point for systematic review.

We considered performing a similar validation by comparing the requirements that STARA surfaced for Maryland with the reports in the Maryland Department of Legislative Services (DLS) Library & Information Services online catalog. However, spot-checking a sample of DLS reports revealed that such a comparison would be confounded by other sources of variation including inconsistently formatted linkages to respective mandates, multiple filings per mandate, and the presence of many reports mandated by non-statutory sources (*e.g.*, budget committee requests, uncodified session law, and regulations) and local government filings (examples of some of these reports are shown in Appendix Table 1). Given this, we concluded that it would be challenging to systematically determine whether discrepancies between our findings and the catalog arose from AI-induced misclassifications. Therefore, we focused our validation on the California Agency Reports database as the cleanest data source available to us from a partner state.

Appendix Table 1. Taxonomy of DLS Library Reports Not Likely Captured in Statutory Search.

Category	Why the statutory search misses it	Representative example
Budget bill language (JCR)	Report requested in committee narrative of the annual Joint Chairmen's Report; the mandate appears nowhere in the Annotated Code.	DBM report on service contracts, 2023 JCR p. 57.
Uncodified session law	Reporting requirement enacted in an uncodified section of a chapter law and never transferred to the Code.	County trauma-informed behavioral health reports under Ch. 55 of 2021 (H.B. 1372).
No legal mandate cited	Voluntary, traditional, or externally mandated publications swept in by the catalog's "report" keyword search.	Workers' Compensation Commission annual report (no citation in catalog).
Legislative branch audit	Sender is the Office of Legislative Audits, a legislative branch entity; audits are excluded as standard administrative procedure (criteria 1–2).	OLA fiscal compliance audit of the Maryland Judiciary.
Other non-statutory authority	Federal reporting cycles, interstate compacts, and internal directives outside the Code.	Correctional facility audits by the Maryland Commission on Correctional Standards.
Statutory mandate, excluded sender	Code provision exists, but the submitter is a local government, school system, legislative committee, court, or university, all excluded by criterion 2.	Somerset County financial report, Md. Code Ann., Local Gov't § 16-304.
Statutory mandate, executive sender	In-scope candidate misses: adjacent-section or renumbered citations, provisions classified as data submissions or routine financial filings, and a residue of true search errors.	Maryland State Police annual report, Md. Code Ann., Pub. Safety § 2-202.
Regulation (COMAR)	Mandated by regulation rather than statute.	DGS procurement forecast report under COMAR 21.11.03.08.

C.2 Manual validation of random sample. Second, we manually reviewed 200 randomly sampled provisions (after applying our regular expression pre-filter) from five other states: New Mexico, Florida, Connecticut, Rhode Island, and Wisconsin. We made our own determinations of positive labels for reporting requirements based on our experience iterating on report definitions with our three state agency partners. STARA identified 15 reports in the random sample of 200 provisions, and our error analysis identified one false positive and one false negative. We flagged one report as a false positive because it had a local-level recipient. The one report we flagged as a false negative was more ambiguous. The provision described the contents of a report originating in a different statutory section; STARA had correctly identified the original section as a reporting requirement, yet marked this subsequent section as negative. So, STARA did not miss this report in its overall set of results, but its reasoning on the specific provision was contestable. We conducted this manual review in order to expand our validation to a few more states beyond California. However, given this validation exercise's small sample size, yielding only fifteen identifiable ground truth reporting requirements even after filtering on keywords, it should be interpreted only as suggestive evidence of performance.

C.3 Validation from agency partners. Third, we conducted novel internal surveys with agencies in California and Maryland, in which agency staff reviewed STARA results and provided feedback on whether they constituted actual reports. Indeed, both agencies initially considered our lists to be over-inclusive relative to the types of reports they wished to focus on, leading us to iteratively tighten our filtering and prompting approach, while still opting for a wide enough compilation for our public release to support other states which may have more expansive definitions.

D. Cross-state Analysis

D.1 Reporting Requirements Across 50 States.

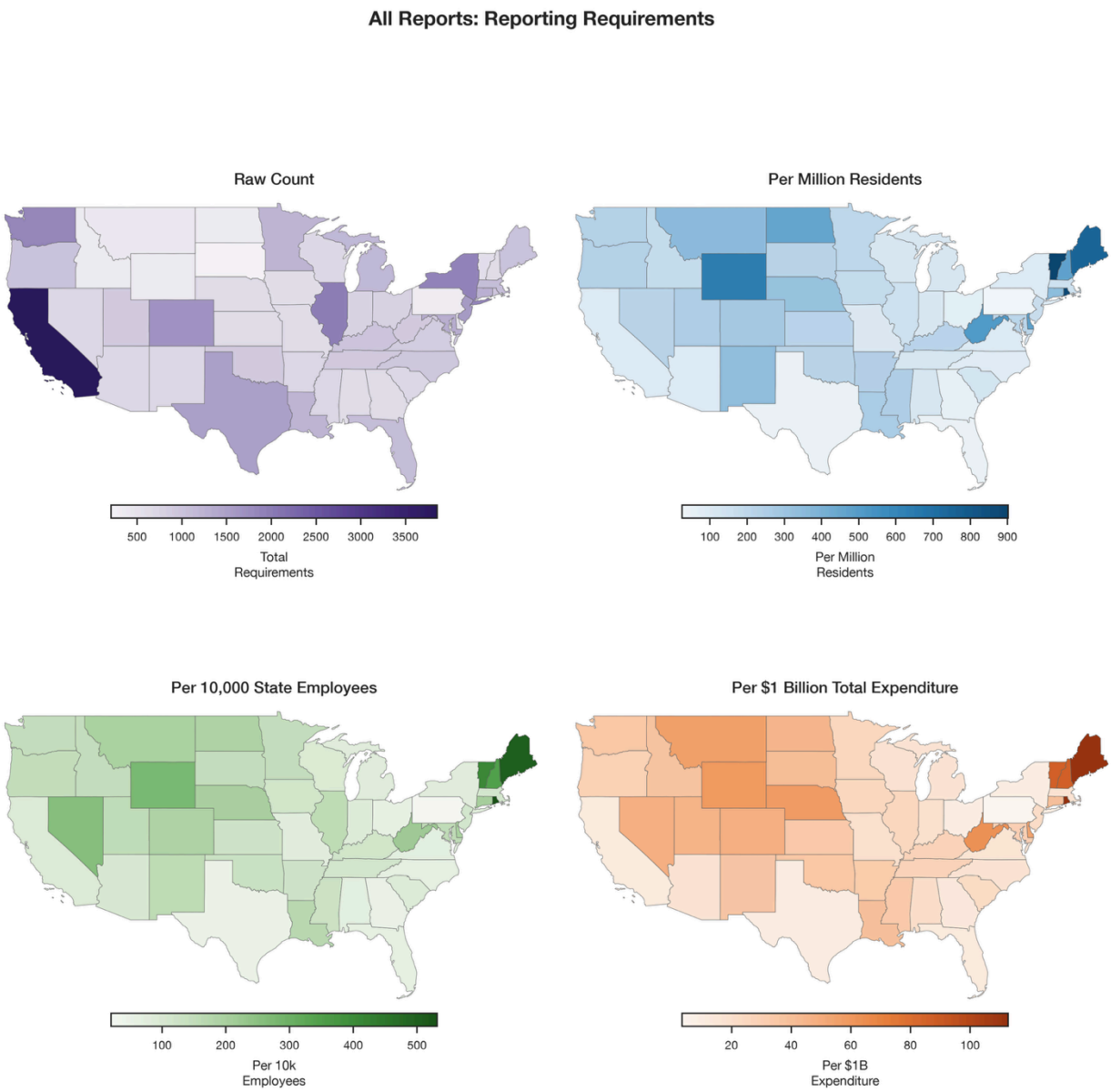
Appendix Table 2. Reporting Requirements by State. "Total" refers to all potential reporting requirements identified in the state codes. "Recurring" refers to requirements that recur at regular intervals (*e.g.*, annually, quarterly) without a defined end point. "Likely active" refers to requirements that are likely to be currently active (as of July 1, 2026), or likely to become active in the future.

State	Total	Recurring	Likely Active
Alabama	622	470	572
Alaska	373	279	366
Arizona	711	543	672
Arkansas	747	560	716
California	3,854	1,709	2,635
Colorado	1,676	932	1,234
Connecticut	1,271	767	965
Delaware	505	373	447
Florida	1,110	778	1,007
Georgia	641	465	575
Hawaii	570	454	537
Idaho	353	269	336
Illinois	1,950	1,160	1,461
Indiana	763	503	666
Iowa	597	473	563
Kansas	638	421	525
Kentucky	993	719	896
Louisiana	1,230	847	1,075
Maine	1,042	794	978
Maryland	1,330	976	1,173
Massachusetts	1,099	856	1,052
Michigan	1,182	789	965
Minnesota	1,208	821	1,070
Mississippi	737	501	612
Missouri	647	434	555
Montana	398	271	382
Nebraska	638	436	550
Nevada	734	575	718
New Hampshire	661	498	612
New Jersey	1,582	967	1,229
New Mexico	729	544	655
New York	1,887	1,219	1,494
North Carolina	939	730	904
North Dakota	363	254	345
Ohio	794	575	727
Oklahoma	892	607	743
Oregon	1,014	642	904
Pennsylvania	324	222	258
Rhode Island	973	652	779
South Carolina	708	500	637
South Dakota	207	148	191
Tennessee	908	602	771
Texas	1,515	1,097	1,396
Utah	899	609	786
Vermont	585	389	492
Virginia	875	658	828
Washington	1,865	889	1,253
West Virginia	904	598	705
Wisconsin	687	474	629
Wyoming	375	257	340
U.S. Total	**47,305**	**31,306**	**39,981**

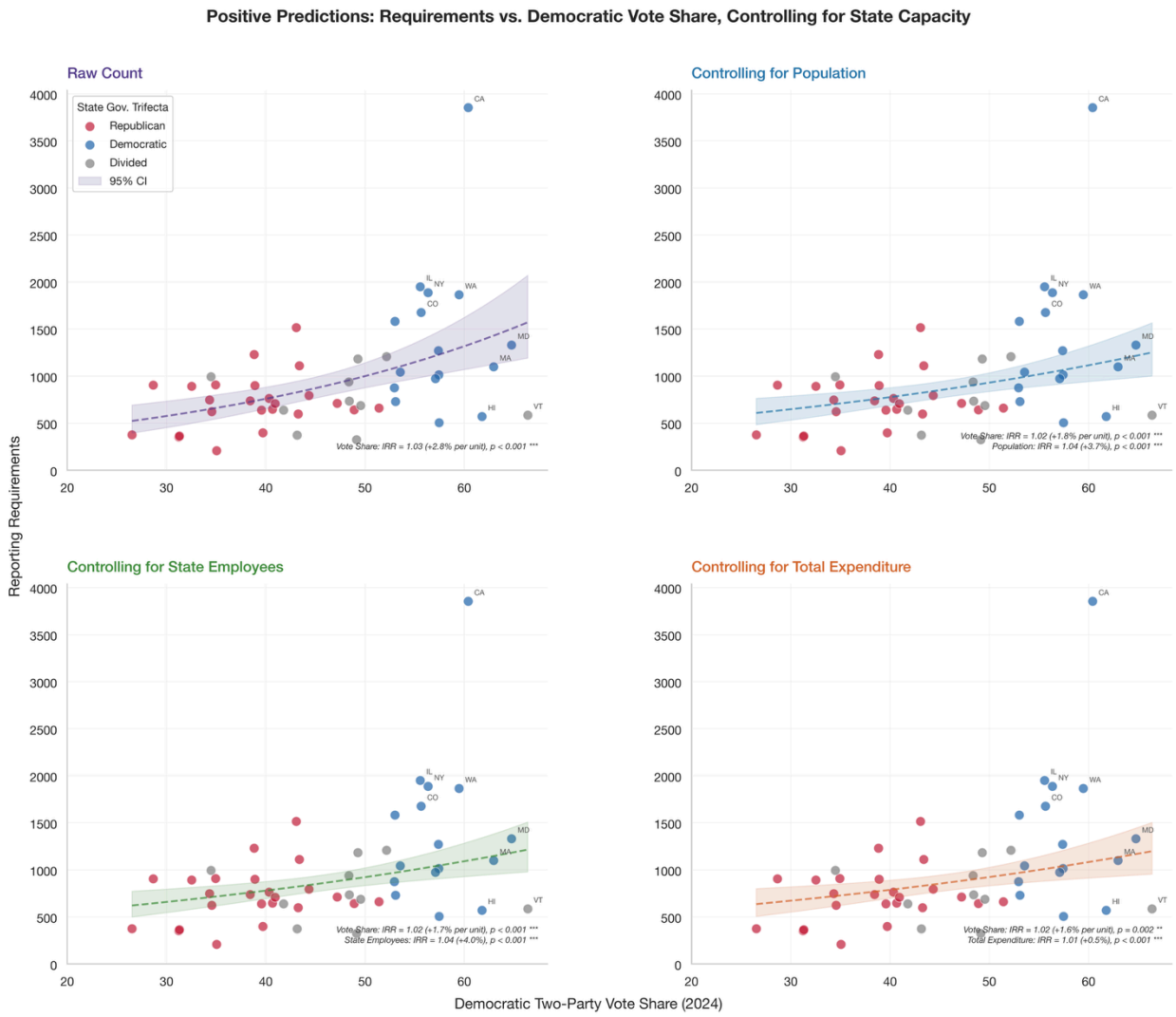
D.2 Geographic Normalization for Choropleth Maps. We computed four normalized measures of reporting requirements to visualize distinct dimensions of reporting burden:

(1) *Raw counts*: Absolute number of reporting requirements, reflecting total legislative activity.
(2) *Per capita*: Requirements divided by state population (millions), using 2024 Census estimates. Interpretation: citizen-facing reporting density.
(3) *Per government size*: Requirements divided by state government employees (per 10,000), using the CSPP variable stateemploy (2016). Rationale: State employees represent the administrative capacity available to produce mandated reports. Interpretation: bureaucratic reporting intensity.
(4) *Per budget size*: Requirements divided by general state expenditure (per $1 billion), using the CSPP variable total_expenditure in thousands of dollars (2016). Rationale: General expenditure is the standard measure of state fiscal capacity in public administration research, capturing core operational spending. Interpretation: fiscal reporting density.

Government employment and expenditure denominators are from 2016, while reporting requirements reflect cumulative statutory mandates through 2024 and population estimates are from 2024. This temporal mismatch is acceptable because state government size and fiscal capacity are relatively stable in rank-order over this period, and our analysis is cross-sectional rather than longitudinal.

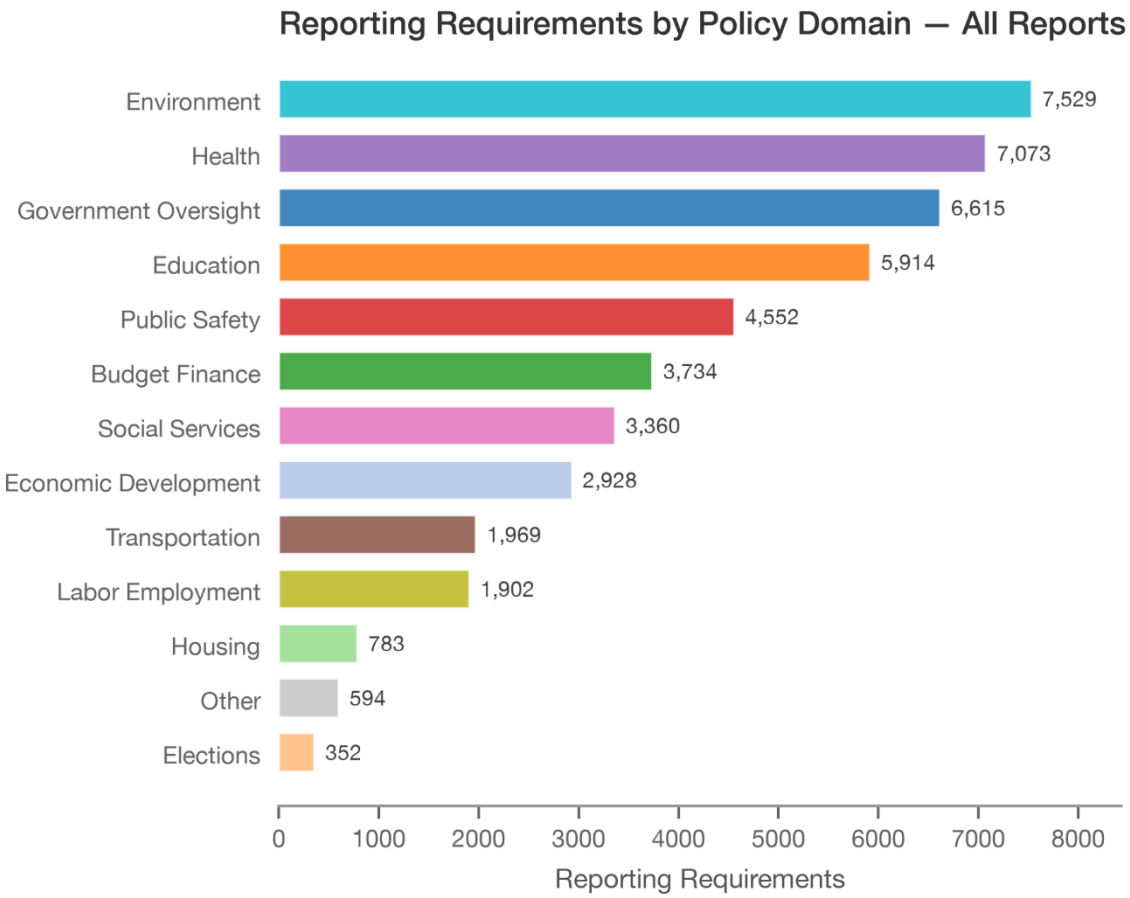


Appendix Figure 1. Geographic Distribution of Reporting Requirements. Darker shading indicates a higher count of reporting requirements.



Appendix Figure 2. Reporting Requirements and Democratic Two-Party Vote Share, Adjusting for State Size and Administrative Capacity. Each panel plots a state's total reporting requirements against its 2024 Democratic two-party vote share. Data points are colored according to state government trifecta status (2025). Regression lines and incidence rate ratios (IRR) represent negative binomial regressions of reporting requirements on Democratic two-party vote share, with shaded bands giving 95% confidence intervals. The top-left panel is unadjusted; the remaining panels add population, state government employment, or total expenditure (all 2016) as controls for state size and administrative capacity. IRRs give the estimated percentage change in requirements per one-point increase in vote share (or per unit of the control); exact p-values appear in each panel. This figure complements Appendix Figure 1's choropleth normalizations.

D.3 Policy Domain. In what areas of state government activity do reporting requirements concentrate? Environment (7,529 requirements), Health (7,073), and Government Oversight (6,615) together account for 45% of all identified mandates.



Appendix Figure 3. Distribution of Reporting Requirements by Policy Domain. Horizontal bars represent the count of reporting requirements identified across all 50 state codes (n=47,305), categorized by policy domain.

D.4 Political Affiliation and Partisan Lean. We operationalized state political orientation using three measures: Democratic two-party vote share from the 2024 presidential election, state government trifecta status, and a historical partisanship classification based on presidential election outcomes from 1988-2024.

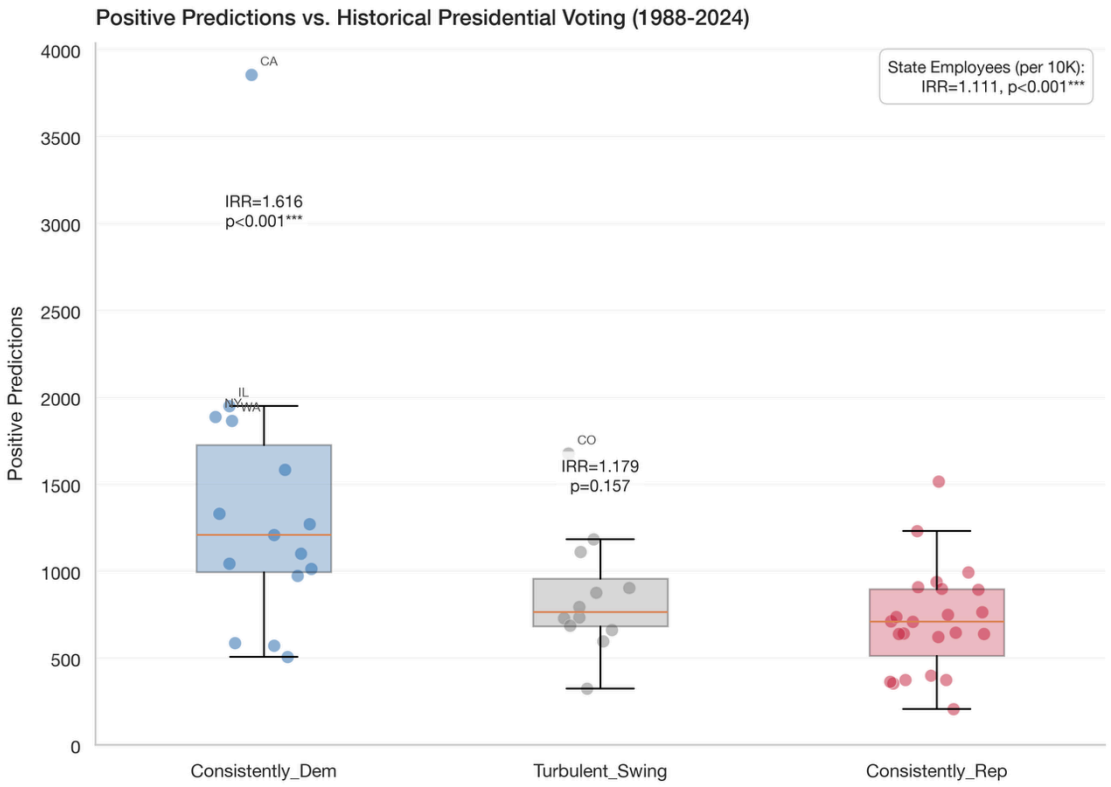
First, we calculated the Democratic two-party vote share from the 2024 presidential election, defined as the percentage of major-party votes cast for the Democratic candidate[2]: Democratic votes ÷ (Democratic votes + Republican votes) × 100. This continuous measure, standard in political science research, excludes third-party candidates to provide a direct comparison of relative partisan support. Values ranged from 26.5% (Wyoming) to 66.4% (Vermont) among states, with a median of 43.2%.

Second, state government trifecta status reflects unified partisan control as of January 2025, defined as one party holding the governorship and majorities in both chambers of the state legislature.[3] Following the 2024 elections, 23 states had Republican trifectas, 15 had Democratic trifectas, and 12 had divided government. Nebraska's unicameral legislature is classified based on gubernatorial party and legislative majority.

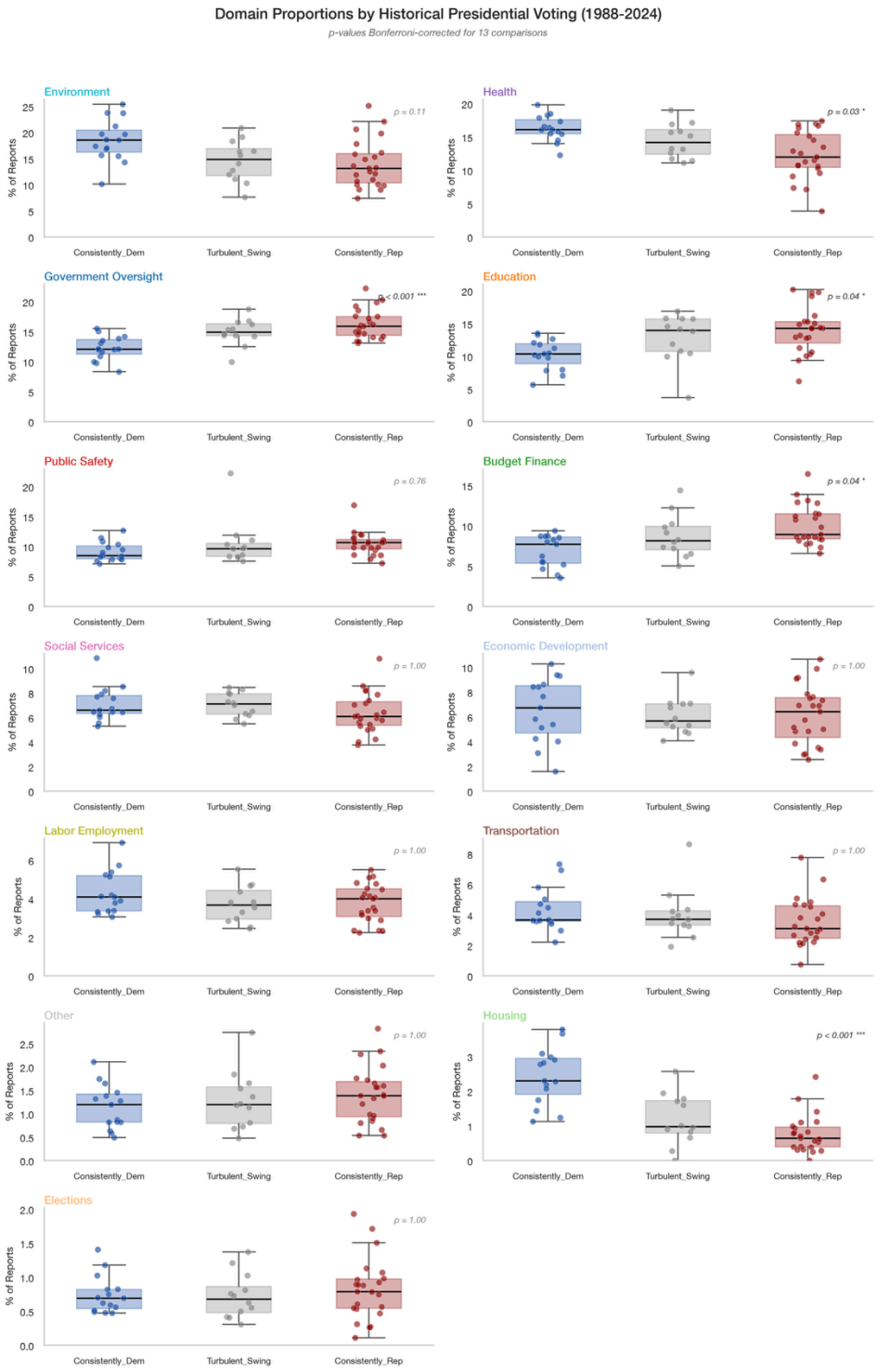
Third, to address concerns that current partisan measures may not reflect the political environment during the period of greatest report accumulation, we constructed a historical partisanship classification based on presidential election outcomes from 1988–2024. States were classified as "Consistently Democratic" if Democrats won at least 8 of the 10 presidential elections during this period (16 states), "Consistently Republican" if Democrats won 2 or fewer elections (23 states), or "Turbulent/Swing" if Democrats won 3–7 elections (12 states). This measure captures durable patterns in state electorates' revealed partisan preferences across the full accumulation period documented in our longitudinal analysis, rather than relying solely on point-in-time snapshots that may not represent the political conditions under which reporting requirements were enacted.

Our analyses focus on the Democratic two-party vote share as the primary continuous measure, reflecting the electorate's revealed partisan preferences in a recent federal election, but we also incorporate state trifecta status in our visualizations to indicate the party in effective control of state policymaking at the time our reporting requirements data was collected. The historical partisanship classification serves as a robustness check to ensure results are not artifacts of measuring partisanship at a single point in time rather than across the full accumulation period.

[2] *See The American Presidency Project*, UC Santa Barbara, https://www.presidency.ucsb.edu [https://perma.cc/N3UX-383X] (last visited February 6, 2026).
[3] *See State Government Trifectas*, Ballotpedia, https://ballotpedia.org/State_government_trifectas [https://perma.cc/8ST2-96LK] (accessed December 2024; updated to reflect November 2025 election results in Virginia and New Jersey).



Appendix Figure 4. Reporting Requirements and Historical Presidential Voting Pattern (1988–2024), Corrected for State Government Size. Box plots showing a negative binomial regression between the number of reporting requirements and state historical presidential voting pattern (1988-2024) – Consistently Democratic (blue), Turbulent/Swing (gray), and Consistently Republican (red). The regression corrects for size of state government by 10K employees (2016). Individual states shown as points. Compared to consistently Republican states, consistently Democratic states have significantly higher counts of reporting requirements, but Turbulent/Swing states do not have a significant difference.



Appendix Figure 5. Distribution of All Reporting Requirements Across Policy Domains by Historical Presidential Voting Pattern (1988–2024). Box plots showing the proportion of all reporting requirements in each policy domain, grouped by state historical presidential voting pattern: Consistently

Democratic (blue), Turbulent/Swing (gray), and Consistently Republican (red). Individual states shown as points. p-values are Bonferroni-corrected for 15 comparisons.

D.5 Bivariate Correlation Analysis.

Appendix Table 3. Negative binomial regressions between 2016 state covariates and 2024 reporting requirements across all 50 states.

Covariate	IRR	95% CI	p-value
Total Population	1.046***	[1.029, 1.063]	< 0.001
State Employees	1.047***	[1.031, 1.063]	< 0.001
Total Expenditure	1.063***	[1.040, 1.086]	< 0.001
Public Welfare / General Expenditure (%)	1.047***	[1.023, 1.072]	< 0.001
Total Revenue	1.064***	[1.040, 1.088]	< 0.001
Real GDP	1.085***	[1.054, 1.116]	< 0.001
Democratic Vote Share	1.028***	[1.015, 1.041]	< 0.001

Note: IRR = Incidence Rate Ratio. *** p< 0.001, ** p< 0.01, * p< 0.05

Total expenditure and total revenue data were available in 1,000s of current dollars, and real GDP was in millions of chained 2009 dollars. Variables were subsequently scaled as follows for stability: total population by 1 million residents, state employees by 10,000, total expenditure and total revenue by an additional 10 million dollars, and real GDP by an additional 100,000 dollars.

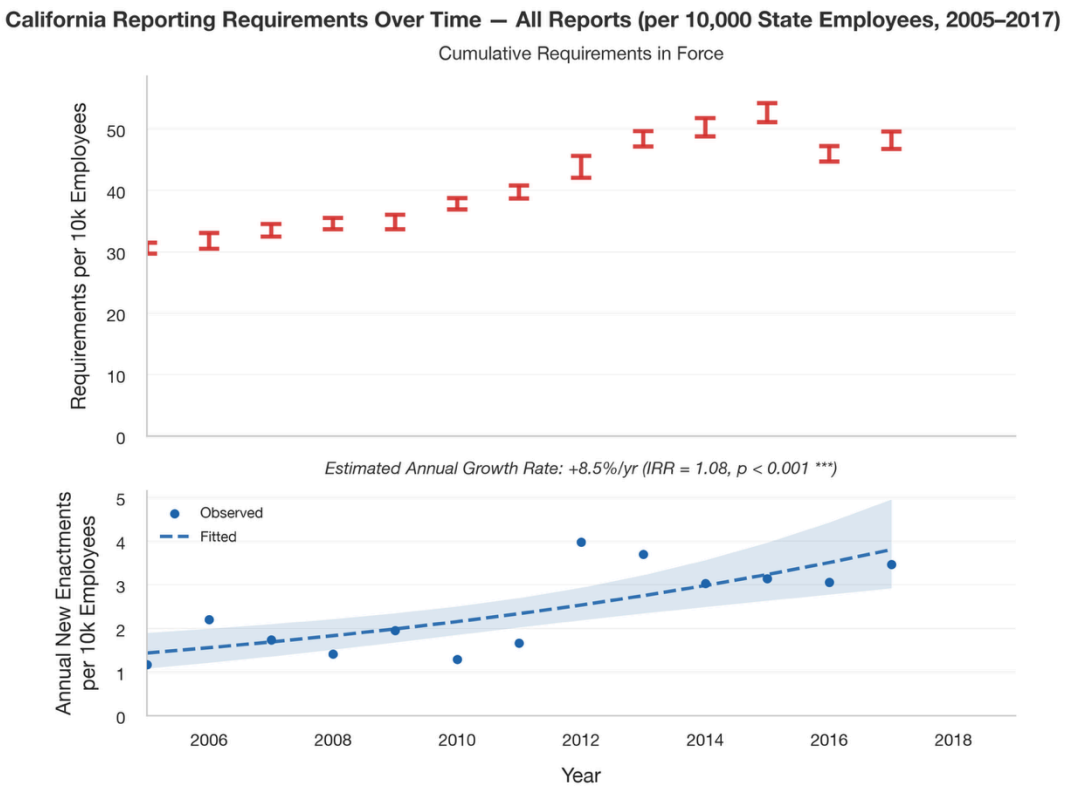
We fit negative binomial regressions using all combinations of these covariates and reporting requirements to find the best model. The significant positive correlation with Democratic vote share persisted across multiple different combinations of covariates in the top ten best-fit models. The regression with the lowest Bayesian Information Criterion only had two predictors: State employees and Democratic vote share. This is the model we used for our primary analysis.

E. California Temporal Report Accumulation, Changing Size of the Civil Service

To test the claim that the growth over time of California reporting requirements from 1935 to 2025 (Figure 2) dwarfs any change in the size of the state's civil service, we normalized requirement counts by state government employment, expressing both the cumulative stock of requirements in force and the annual flow of new enactments per 10,000 state employees. State employee counts were drawn from the Correlates of State Policy Project, which provides consistent figures for California only from 2005 to 2017; the normalized analysis is therefore restricted to that window rather than the full ninety-year span of report accumulation shown in Figure 2. Because the normalized series differs from the raw series in scale, units, and temporal coverage, we present it as a self-contained appendix figure rather than as a second overlaid axis on Figure 2, avoiding the scaling distortions associated with dual-axis charts.

We estimated the growth rate in per-employee requirements using a negative binomial regression of the annual count of newly enacted requirements on year, with the logarithm of state employee headcount entered as an offset. This specification yields the annual growth rate in enactments net of changes in the size of the workforce producing the reports. If the growth documented in Figure 2 merely tracked the expansion of state government, the per-employee series should be approximately flat and the estimated growth rate near zero. Instead, requirements per employee grew at an estimated 8.5% per year (IRR = 1.08, 95% CI [1.04, 1.13], $p < .001$). Because the employment series rises approximately 23% between 2015 (337,637 employees) and 2016 (414,679)—a jump most likely reflecting a revision in data-collection methodology rather than actual workforce expansion[4]—we conducted a sensitivity analysis excluding 2016–2017, which yields a materially similar estimate of +9.9% per year (IRR = 1.10, $p < .001$). These results indicate that the growth in reporting requirements is not just an artifact of a growing state government, and Appendix Figure 6 presents the corresponding stock and flow series.

[4] The state-employee counts are drawn from the Correlates of State Policy Project (CSPP). *See* Grossmann et al., *supra* note 62. CSPP compiles them from the U.S. Census Bureau's Annual Survey of Public Employment & Payroll (ASPEP). The reported California figures rise roughly 23% between 2015 and 2016, reflecting an apparent change in the underlying Census series from full-time (FT) to full-time equivalent (FTE) employment: CSPP's 2015 value equals the Census FT count (337,637) and its 2016 value equals the FTE count (414,679). *See* U.S. Census Bureau, Annual Survey of Public Employment & Payroll: State Government (Mar. 2015), https://www2.census.gov/programs-surveys/apes/datasets/2015/annual-apes/2015_state.xls (last visited July 15, 2026) (California full-time employees); U.S. Census Bureau, Annual Survey of Public Employment & Payroll: State Government (Mar. 2016), https://www2.census.gov/programs-surveys/apes/datasets/2016/annual-apes/2016_state.xls (last visited July 15, 2026) (California full-time-equivalent employees). Measured on a consistent basis, California's state workforce grew roughly 2% per year over this period. *See* U.S. Bureau of Labor Statistics, All Employees: Government: State Government in California [SMS06000009092000001], retrieved from FRED, Fed. Rsrv. Bank of St. Louis (last visited July 15, 2026), https://fred.stlouisfed.org/series/SMS06000009092000001. Because the FTE-based figures for 2016-2017 inflate the denominator relative to the FT series used in adjacent years, they pull the estimated association toward zero, making the reported growth estimate conservative; the sensitivity analysis excluding those years supplies the cleaner figure.



Appendix Figure 6. California Statutory Reporting Requirements, per 10,000 State Employees, All Reports (2005–2017). The top panel shows the estimated cumulative stock of requirements in force each year; vertical bars span the range implied by uncertainty in enactment and amendment dates. The bottom panel shows annual new enactments, with the fitted negative binomial regression (dashed line) and 95% confidence interval (shaded band).

F. California Noncompliance Estimation Methodology

We scraped the CA Agency Reports Database in August 2025, yielding 2,124 reports derived from statutory codes. We matched our STARA search results from California to the database using fuzzy matching by citation. The STARA results captured 79.5% of the entries in the database. We merged filing evidence from the CA Agency Database with the STARA results, saving all filing dates if multiple reports from the database corresponded to a given STARA report. This resulted in a subset of 1,664 STARA results with matches to the database. We used this subset for subsequent analyses, and did not account for the 435 reports in the Agency Database that did not have matches in the STARA results.

We used STARA-extracted metadata on reporting frequency, reporting schedule, enactment dates, and amendment dates for this analysis. There may be discrepancies between the metadata extracted by STARA and the fields documented in the Agency Database. First, we filtered the 1,664 reports to 822 ongoing, recurring reports. Next, we removed reporting obligations that began after August 1, 2025, yielding 797 reports. Then, we obtained a subset of 270 reports that had no evidence of ever being filed in the database. Finally, we removed reports that had enactment or amendment dates of 2024 or later, in case annual reports enacted recently had not been filed before August 2025. (This approach does not account for cases in which a report has a submission cadence less frequently than annually.) This process results in 239 reports.

We calculated noncompliance as 239/797= 29.99% of ongoing, recurring reporting obligations that started prior to August 2025 have never been filed, according to available evidence in the Agency Reports database.

G. Federal Cost Estimation Methodology

We estimated current federal reporting costs by extrapolating from historical GAO figures[5,6]:

- FY 1980 baseline: 1,566 recurring requirements costing approximately $47 million (estimated from $80+ million for all 2,680 requirements assuming proportional cost distribution).
- FY 1986 baseline: 3,300 recurring requirements costing $240 million, yielding $73,000 per requirement.
- Inflation adjustment: CPI multiplier of 2.8× (1986 to 2024 dollars), yielding $204,000 per requirement in 2024 dollars.

[5] U.S. Gov't Acct. Off., PAD-82-12, *A Systematic Management Approach Is Needed for Congressional Reporting Requirements* (1981).
[6] U.S. Gov't. Acct. Off., PAD-88-4, *Efforts to Eliminate or Modify Reporting Requirements Need to Be Improved* (1988).

- Current count: 4,638 unique recurring requirements identified via STARA (53.6% of 8,652 total).[7]

Estimate ranges incorporate: *(1)* inflation adjustment only, *(2)* 1–2% annual real growth rates to account for increased complexity, and *(3)* overhead multipliers of 1.5–2X to capture management and administrative costs excluded from historical GAO figures. We present these figures as heuristics rather than measurements: no contemporary counterpart to the GAO's 1980s cost accounting exists, so an assumption-driven extrapolation is the only available bridge from those snapshots to the present, and we bound it with explicit ranges precisely so that readers can discount the estimate according to their confidence in each assumption.

[7] Federal requirements drawn from the results of a STARA search of the United States Code (2024) for legislative mandated reports.