

Results from the Identifying Challenges to Implementing the ADA Survey for Cities and Towns in New England*

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23 May 2019

Abstract

Title II of the Americans with Disabilities Act of 1990 (ADA) protects individuals with disabilities from discrimination in services, programs and activities provided by state and local government entities. Title II requirements represent a civil rights mandate for local governments and adherence to requirements is largely unknown. We conducted a survey of cities and towns in New England to ask whether local governments are meeting their responsibilities under Title II and if not, what difficulties do they have with implementation. Results suggest that compliance is a substantial challenge for most localities and a lack of personnel and the understanding about the requirements appear to be the predominant hurdles.

*This study was made possible through a grant (#90DP0087) from the Administration for Community Living (ACL) and the National Institute on Disability, Independent Living, and Rehabilitation Research (NIDILRR).

Introduction

The Americans with Disabilities Act of 1990 (ADA) provides protections from discrimination for people with disabilities as they participate in the many facets of public life from employment to civic participation.¹ Title II of the ADA requires state and local governments to protect individuals with disabilities from discrimination in the services, programs and activities they provide.² The Department of Justice promulgates regulations to define these Title II obligations.³ These regulations set certain administrative requirements for local government entities:

- Perform a self-evaluation of its current services, policies, and practices, and the effects thereof for compliance with ADA regulations, and
- Notify the public about ADA compliance.

In addition, Title II standards require public entities with 50 or more employees to:

- Designate a responsible employee to coordinate and carry out responsibilities under ADA,
- Develop a procedure for resolving complaints involving ADA obligations, and
- Develop a transition plan for achieving ADA compliance.

In the twenty-eight years following passage of the ADA, there has been important progress for the inclusion of people with disabilities in the public sphere, but the vision of *maximum community participation* is far from being met. The ADA represents a civil rights mandate and establishes the regulatory framework to assure that those civil rights are being afforded. Implementing the regulatory framework, however, requires the deployment of resources – financial, personnel, time, and attention – for which the federal government provides little direct support. Despite the existence of the ADA National Network and its regional centers available to assist local public entities, there remain significant gaps in implementation. Many communities may still be unaware of their obligations under Title II while others may lack the resources needed to successfully carry them out.

While most ADA Centers have known anecdotally that cities and towns experience substantial challenges to implementing Title II, there has not been a coordinated effort to assess the degree of compliance by local entities across a region. When states have intervened, they have not attempted to first measure the extent of the problem, but instead opted to just move ahead with helping municipalities meet their obligations. The Massachusetts Office on Disability's Municipal ADA Improvement Grant Program is one such example. With this in mind, the New England ADA Center - the Region I member of the ADA National Network -

¹Public Law 101-336, as amended by Public Law 110-325.

²42 U.S.C. 12132, extending 29 U.S.C. 794

³28 CFR Part 35 – Nondiscrimination on the Basis of Disability in State and Local Government Services

undertook a research activity to better understand issues of ADA implementation at the local level. The project had two parts:

1. To examine regional-, state- and city-level prevalence of disability and the characteristics of the populations of people with disabilities.
2. To survey cities and towns across the region about the challenges to implementation of the ADA.

In the first part of the study, we used data from the U.S. Census Bureau and other sources to produce statistics about the prevalence of disability. A major component of this included combining the broadly construed definition of disability found in the Survey of Income and Program Participation (SIPP) with the granularity of data from the American Community Survey (ACS), which has a more narrow definition of disability. Together, the estimates revealed startling findings about the nature of disability in New England as a whole, in each state, and in cities and towns. These results from this part of the study will help inform and educate local officials about the prevalence of disability in their jurisdictions and contribute to the interventions that will support the second part of the study.

In the second part, we developed a questionnaire about ADA Title II obligations which we called the Identifying Challenges to Implementing the ADA (ICIADA) survey and gathered information from representatives of New England cities and towns about how each was (or was not) meeting ADA requirements. The survey was designed to help answer two specific research questions:

1. To what extent and in what areas is compliance to ADA Title II obligations a challenge?
2. What factors impede municipalities from implementing the ADA?

From answers to these two research questions, the New England ADA Center hopes to identify whether there is a specific intervention or innovative approach that can increase implementation of the ADA at the municipal level. In addition to surveying about the Title II administrative requirements mentioned earlier, the ICIADA survey included questions about the accessibility of polling places, emergency shelters, and websites operated by the municipal governments and about the implementation of effective communication guidelines. This paper presents our initial findings from the ICIADA survey.

Data and Methods

The New England ADA Center staff developed the ICIADA survey questionnaire from their expertise as subject matter experts for ADA implementation and their experience providing assistance to municipalities across the region. The key questions from the survey and their associated Title II requirements are shown in Table 1. Staff tested the phrasing of questions and response options with representatives of selected

Table 1: Title II Requirements and Associated ICIADA Survey Questions

Requirement label	50+ only	Survey Question	
		#	Wording
Administrative Requirements			
ADA Coordinator	✓	5*	Is there an employee who handles ADA compliance?
Complaint procedure	✓	7*	Is there a municipal complaint procedure that includes ADA issues?
Notification procedure		9*	Does the municipality notify the public about its compliance with the ADA?
Self-evaluation		11*	Has the municipality conducted a self-evaluation of programs and policies for ADA compliance?
Transition plan	✓	14*	Did the municipality develop an ADA Transition Plan?
Accessible Services, Programs, and Activities			
Accessible voting		18	Are the municipality’s polling places ADA compliant?
Emergency plans†		19	Are people with disabilities considered in all phases of local emergency management?
Accessible shelters†		21	[If municipality operates shelter(s),] are the shelter(s) ADA compliant?
Effective communication		22*	Is there an employee who arranges accommodations for an effective communication request such as sign language interpreter or materials in large print?
Accessible website†		24*	Is the municipality’s website accessible?

* Denotes questions with a follow-up to report reasons for noncompliance

† if applicable

jurisdictions. An online instrument was then built using SurveyMonkey® and used to collect the survey responses.

The survey frame was developed first by taking the list of all 1,543 cities and towns in the New England region and identifying contact information for a representative from each who could reasonably answer the questions about the municipality’s compliance to ADA. Attempts were made to contact the 933 jurisdictions for which a representative was identified through Constant Contact® email software, personal email, and over the telephone. Between June and October 2018, staff at the New England ADA Center and its state affiliates fielded the survey and data were collected from 338 municipalities. Responses were subsequently downloaded from the SurveyMonkey website and loaded into R statistical software for analysis. An initial examination of the data found that 20 observations were either invalid or lack sufficient information to be considered “complete” and were dropped from the study. Two municipalities failed to provide information about their population size, which were imputed from published population counts from the Census Bureau.

Using the survey questions shown in Table 1, we created indicators for compliance with each of the five administrative requirements and accessibility to services, programs, and activities (SPA). A municipality with

fewer than 50 employees is considered to be in compliance with administrative requirements if it answered “Yes” to questions 9 and 11. A municipality with 50 or more employees is considered to be in compliance if it also answered “Yes” to questions 5, 7, and 14. Municipalities who answered “Yes” to questions 19, 22, and 24, and “All” to question 18 and 21 (if applicable) are considered to be in compliance with accessibility to services, programs, and activities. To illustrate the state of compliance, we present statistics about compliance overall, the number of requirements (or still in need of completing), and for each specific items. We present statistics for the New England region as a whole and, where sample sizes allow, by state.

Because the survey is characterized as a non-probability sample, making generalizations to the whole may be problematic, and yet, certain methods can be employed to help lessen bias. Using information about the location and population of municipalities, we calculated a rudimentary weighting scheme using post-stratification to adjust sample counts to known counts of municipalities by state and population size. The weight for a particular strata d is estimated as $w_d = \frac{N_d n}{n_d N}$, where N is the total number of municipalities, N_d is the number of municipalities in strata d , n is the number of municipalities in the sample, and n_d is the number in the sample in strata d . In this paper, all percentages are presented as a weighted estimate, unless otherwise specified, correcting for some differences between the sample and actual population of cities and towns. Unweighted estimates are included in the appendix tables.

Table 2: Sample Size and Weighting by State and Population

	# of Cities/Towns			# in Sample			Sample weights	
	Total	Pop >10k	Pop <10k	Total	Pop >10k	Pop <10k	Pop >10k	Pop <10k
<i>Total</i>	<i>1,543</i>	<i>365</i>	<i>1,178</i>	<i>319</i>	<i>118</i>	<i>201</i>	<i>0.64</i>	<i>1.21</i>
Connecticut	169	97	72	39	28	11	0.72	1.35
Maine	491	21	470	99	3	96	1.45	1.01
Massachusetts	351	180	171	113	66	47	0.56	0.75
New Hampshire	242	30	212	36	6	30	1.03	1.46
Rhode Island	39	29	10	11	9	2	0.67	1.03
Vermont	251	8	243	21	6	15	0.28	3.35

Results

Sample Composition and Weighting

Before presenting the results of survey questions, it is helpful to understand how the municipalities in our study differ from the region as a whole. Table 2 shows the population and sample counts in each strata used for calculating weights. The first two columns show the distribution of cities and towns across the 6 states and by population size (as over or under a threshold of 10,000 people). The next two columns show the same distribution, but for those cities and towns in the ICIADA sample. The last 2 columns show sample

weights for each of the state-population groups. A weight greater than 1.0 indicate an underrepresentation of municipalities from that state-population group in the sample, while weights less than 1.0 represent an overrepresentation. For example, small towns (under 10,000 people) in Vermont were vastly underrepresented as they had a weight of 3.35 while larger towns (over 10,000 people) in Vermont were overrepresented weight of 0.28. Overall, the sample was skewed toward Connecticut, Massachusetts, and Rhode Island. The sample was also disproportionately cities and towns with populations of 10,000 or more. The weights are intended to help correct for some of the effects of this imbalance on Title II compliance measures.

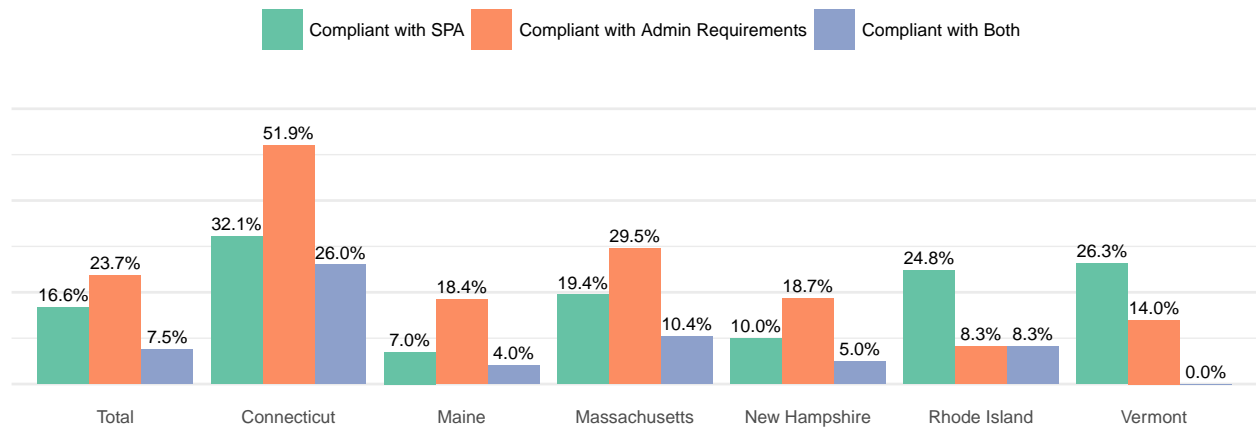


Figure 1: Compliance with Title II Requirements

Overall Compliance

Overall, 7 percent of municipalities in the New England region were compliant with all Title II administrative requirements and accessibility requirements for their services, programs, and activities, as shown in Figure 1. Compliance differed by state, with a high of 26 percent of municipalities in Connecticut meeting the requirements. In our sample, however, no municipality in Vermont was in complete compliance. Looking only at administrative requirements, 24 percent of municipalities were in compliance and rates of compliance for the states ranged from 8 to 52 percent. Despite having more additional requirements, municipalities with 50 or more employees were more likely to achieve compliance (34 percent) than municipalities with fewer than 50 employees (16 percent), as shown in Figure 2. For individual states, however, differences in the levels of compliance were not statistically significant. In addition to those in compliance, another 37 percent of municipalities with 50 or more employees were near compliant, meaning they were just 1 or 2 requirements short of being fully compliant. Likewise, for municipalities with fewer than 50 employees, 35 percent met only one of the two requirements. Figure 1 also shows 17 percent of municipalities were compliant with accessibility to services, programs, and activities, with compliance rates for states ranging from 7 percent to

32 percent.

Figure 2 also shows the distribution of number of requirements completed. Most municipalities were complying with at least some of the requirements; only 2 percent of municipalities with 50 or more employees were noncompliant with all 5 requirements and 48 percent of those with fewer than 50 employees were noncompliant with both requirements. The data also suggest there is substantial variation across states in the number of compliant requirements.

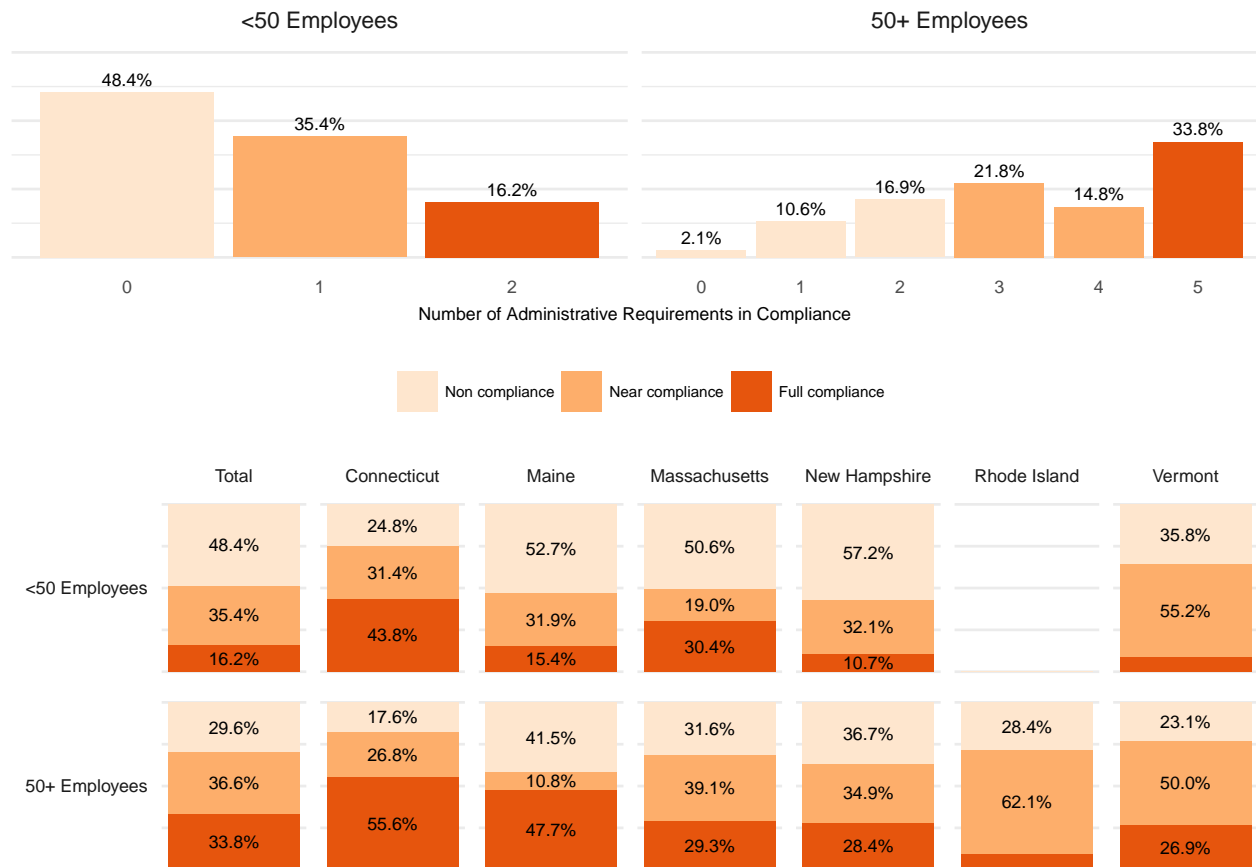


Figure 2: Administrative Requirements

Of the primary reasons for noncompliance, responses appear distributed evenly, however lack of personnel (41 percent) and lack of knowledge (36 percent) hold a slight edge over lack of money (35 percent) or time (8 percent), as shown in Figure 3. Responses of “in progress” of completing requirements, “just a small town”, or addressing ADA concerns reactively or “ad hoc” were less prevalent, but were identified as common themes in other/write-in response option. Lacking personnel appeared to be a primary reason for noncompliance across the states, with the exception for Massachusetts where lack of knowledge was the most cited, and Rhode Island where lack of money was the most cited.

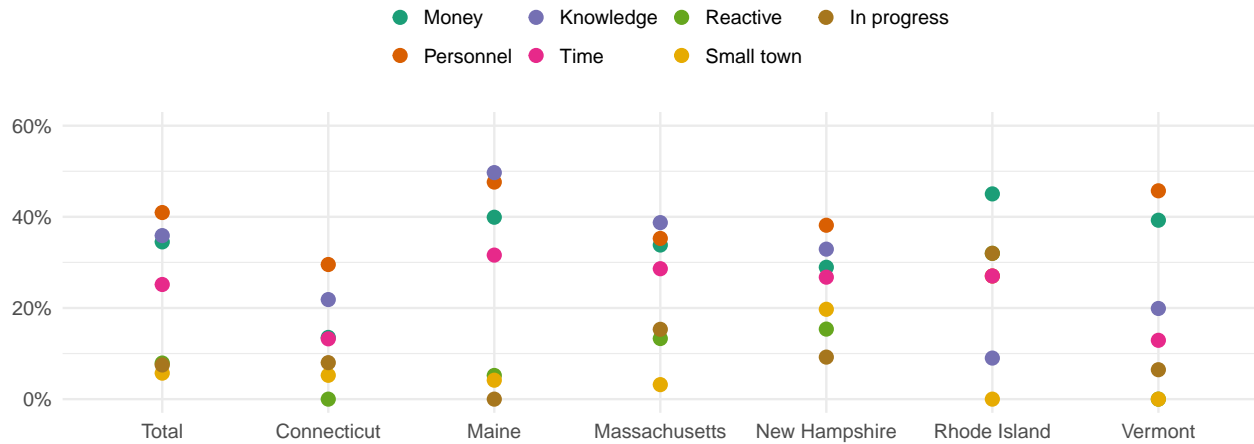


Figure 3: Reasons for Noncompliance

Individual Title II Requirements

Compliance with individual requirements are shown in Figure 4. Results show that 41 percent of municipalities in New England have conducted a self-evaluation of their programs and policies and almost half (50 percent) had a procedure in place for notifying the public about ADA issues. The modal response for why a self-evaluation had not been conducted cited the lack of personnel (46 percent), but lack of knowledge was close behind (43 percent), as shown in Figure 5. Lack of knowledge was the most common response for not meeting the notification requirement (47 percent). Over 90 percent of municipalities with 50 or more employees had an employee to designated to handle ADA compliance and over three-quarters had a procedure for receiving and addressing complaints. Of those who did not have an ADA coordinator or other designated employee, lack of personnel was the modal response. Of the administrative requirements, developing a transition plan had the lowest compliance at 45 percent. For those without a transition plan, lack of knowledge and personnel were the most common reasons cited.

Services, programs, and activities generally had higher compliance. 93 percent reported that all polling places in the jurisdiction were ADA accessible, 80 percent of those who operated emergency shelters reported that all were accessible, 77 percent had considered people with disabilities in all phases of emergency management, and 62 percent had an employee who arranges accommodation requests for effective communication such as sign language interpreters or large print materials. For those not yet arranging effective communication, the lack of personnel was the most common response although many cited handling accommodations on an “as needed” basis. Of the requirements least in compliance, having an accessible website was the lowest at 33 percent with lack of knowledge was the most cited reason for noncompliance. For the question about website compliance, however, a plurality did not seem to know whether or not their municipal website was accessible and several noted that their website was in the process of being upgraded and made accessible.

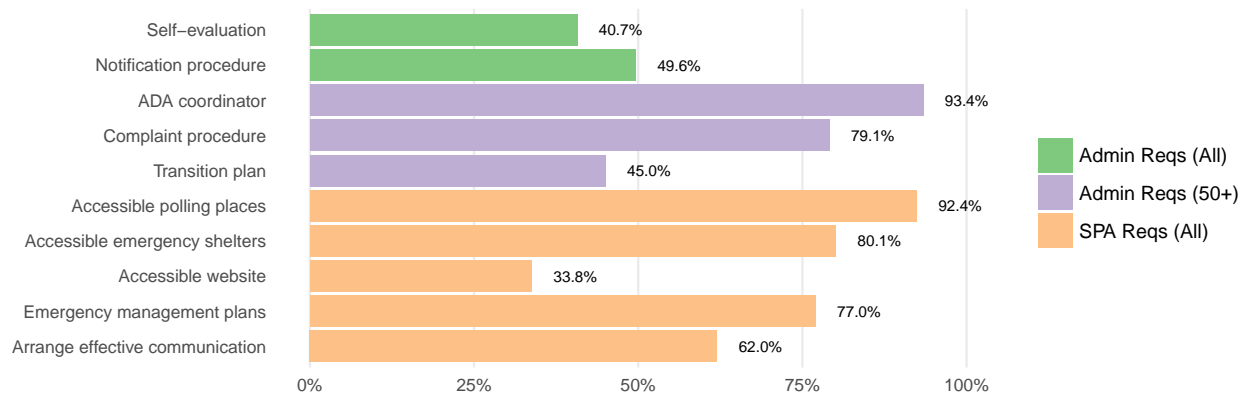


Figure 4: Compliance with Individual Title II Requirements

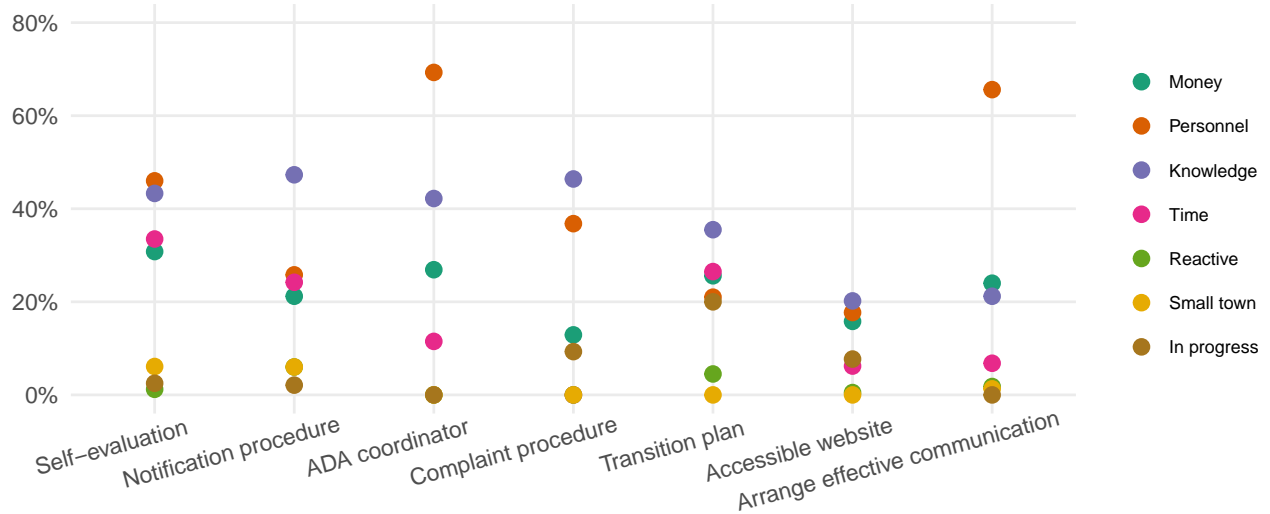


Figure 5: Reasons for Noncompliance with Individual Requirements

Appendix Table 2.A shows correlations across requirements. Positive correlations imply that the pair of requirements are completed together whereas negative correlations imply that the pair are treated as “either/or”. Overall, requirements were not strongly correlated with each other, although there were some exceptions. Completion of a self-evaluation was moderately correlated with the existence of a transition plan (0.45) and having an ADA coordinator was correlated with providing effective communication (0.48). Notification and complaint procedures were weakly correlated with each other (0.34). Overall, compliance with accessibility to services, programs, and activities was only weakly correlated with compliance with administrative requirements (0.30). Compliance with accessible shelter was slightly negatively correlated with the self-evaluation and transition plan requirements (-0.24 and -0.28, respectively). This suggests that some municipalities, possibly constrained by resources, have had to make tradeoffs regarding which tasks they do.

Table 3 shows which requirements were still unmet among municipalities who were close to achieving compliance with all Title II administrative requirements. About a quarter of municipalities were just 1 requirement away from achieving compliance. Among cities and towns with 50 or more employees who were 1 requirement away (i.e., had completed 4 of 5 requirements), over half (56 percent) needed to complete a transition plan. 23 percent still needed a notification procedure and 13 percent needed to complete the self-evaluation. For smaller municipalities who were 1 requirement away (i.e., had completed 1 of 2 requirements), 66 percent needed to do the self-evaluation and 34 percent needed the notification procedure in order to achieve compliance. Among those who were two requirements away, transition plans and self-evaluations remained the most common requirements not yet in compliance.

Table 3: Requirement Compliance by Number of Unmet Administrative Requirements

	1 Requirement Remaining			Requirements Remaining (50+)		
	All	50+	<50	2 Reqs	3 Reqs	4 Reqs
Percent Distribution	26.7	6.3	20.4	9.2	7.2	4.5
Requirements for all municipalities						
Self-evaluation	53.4	12.9	65.9	69.2	75.8	100.0
Notification procedure	31.5	23.4	34.1	40.3	70.4	100.0
Requirements for municipalities with 50+ employees						
ADA coordinator	0.9	3.7	-	1.9	18.7	3.9
Complaint procedure	0.8	3.6	-	7.8	38.2	96.1
Transition plan	13.3	56.3	-	80.8	96.9	100.0

Discussion

Over a quarter-century has passed since the ADA was enacted and yet, as results from the ICIADA survey suggest, assuring that protections for people with disabilities are in place for some of the most basic of government-citizen interactions remain a challenge in many localities. Overall compliance to Title II requirements – assuring that services, programs, and activities are accessible and that appropriate policies and plans are in place – pose a significant challenge for many municipalities. With fewer than 1-in-10 municipalities in full compliance across New England, interventions appear necessary to help local governments follow through with their obligations.

On the first of our research questions – to what extent and in what areas is compliance to ADA Title II obligations a challenge? – we find that local governments are not, by and large, meeting their obligations under Title II. Only about 1-in-6 have services, programs, and activities entirely accessible to people with disabilities in their community, and about a quarter have taken the necessary administrative steps to build the policy framework for tackling discrimination in the provision of public services. Only 7.5 percent of municipalities had done both.

Interestingly, we find that compliance to administrative requirements is higher among cities and towns with 50 or more employees than their smaller neighbors by nearly 2-to-1, despite having additional requirements with which to comply. In fact, nearly half of small governments have not taken any steps toward ADA compliance; they have not performed a self-evaluation nor established a notification procedure.

While larger governments appear further along in meeting obligations, some requirements appear to still elude completion. Fewer than half of larger governments have a transition plan for achieving accessibility goals and the transition plan is the most common requirement needing completion among those who are near full compliance. This may be because other requirements may be more naturally seen as “first step” requirements and that the transition plan is the work product of the ADA coordinator, building off the results of the self-evaluation. Furthermore, developing complaint and notification procedures may be part of broader plan, however these requirements can be implemented while an accessibility transition plan is still being developed. In this sense, the transition plan can be seen as a logical final step toward ADA compliance.

Helping municipalities complete the transition plan requirement is therefore helpful in maximally addressing compliance along both intensive and extensive margins. Because it is among the requirements least complied with, helping municipalities develop plans would increase the average number of completed requirements more than targeting any other requirement for intervention. Likewise, since it is the requirement more needed by near compliant municipalities, helping them achieve this task would raise the percentage of those in full compliance, more than targeting any other requirement.

Helping communities meet their requirements means addressing the reasons for why requirements aren't being met. On this second research question, we found that lack of personnel and knowledge were the primary causes for noncompliance, particularly for the self-evaluation requirement. Resource-using requirements, such as those requiring the hiring of an individual to handle ADA issues, logically cited lack of personnel as the leading cause. Lack of knowledge seems to be the hurdle for developing notification and complaint procedures. There were several reoccurring responses where participants responded, "We haven't had any issues;" or "We didn't think it was necessary." The first statement indicates that knowledge of the ADA is generated through exposure to specific incidents or requests. The second statement indicates the lack of knowledge in some towns across New England.

Overall, the findings about reasons for noncompliance is good news for those designing interventions. Organizations looking to help municipalities achieve compliance are often limited in what kinds of interventions they can do by the availability (or rather scarcity) of resources and funding. And even when funding is available, the size of budgets may limit how many municipalities can obtain those funds. Knowledge-based interventions, where many municipalities can learn from experts at one time, or share best practices with each other, are far more efficient (benefit per dollar), when lack of knowledge is the predominant hurdle.

Some success on this front has already been seen in Connecticut with Municipal ADA Coordinator Certification Program, established by the ADA Coalition of Connecticut, the state affiliate for the New England ADA Center. This program ensures that designated ADA Coordinators have the knowledge and understanding of the law to be effective. The CT Municipal ADA Coordinator Certification requires the successful completion of nine courses that provide fundamental knowledge and is based upon on the National ADA Coordinator Certification created by Great Plains ADA Center. Currently, 36 of Connecticut's 161 municipalities are enrolled in the certification program. This source for shared information may be one reason why compliance was higher among municipalities in Connecticut than the other New England states.

Integrating resource-based interventions for administrative requirements with capital improvement grants is another method for helping municipalities achieve success. The state ADA Coordinator in Massachusetts - Mass Office on Disability (MOD) secured an annual budget of nearly 1 million dollars for three years that offers municipalities the opportunity to compete for funds to undertake an ADA Self-Assessment and Transition Plan. The interest is intense and has resulted in strong competition with 37 municipal recipients. With MOD oversight, cities and towns that secured funding have been rigorous in releasing RFPs and securing contractors. Paired with the subsequent opportunity to apply for MOD capital funds - contingent on a completed ADA Transition Plan - municipalities eagerly pursue funding opportunities.

The Institute for Human Centered Design (IHCD), which houses the New England ADA Center, has used the ADA Transition Plan consulting projects, funded through the MOD grants, to share local and regional

demographic data on disability. There has been keen interest in using the data as an opportunity to pursue grants and other opportunities to find support to be more proactive toward the population of people with disabilities.

Limitations

As stated in the data and methods section, the sample is a non-probability sample and therefore subject to potential bias in its generalizability to all New England cities and towns. Specifically, because conducting the survey required the identifying a contact person at each jurisdiction who could reasonably answer the survey's questions about ADA compliance, many cities and towns without an identifiable contact may be at higher risk of noncompliance with Title II requirements than those in the survey. In addition, the fact that municipalities who completed the survey had an identifiable contacts may help explain why the ADA coordinator requirement completion rate was 94 percent (see Appendix Table 3.A).

In addition to concerns about sample generalizability, definitions of compliance are based on survey self-reports and may not be equivalent to results from a compliance audit or other external reviews of programs and policies. Whether or not a jurisdiction is meeting its Title II obligations is ultimately a decision that can be (and often is) litigated. The New England ADA Center purposefully set out to identify a representative of each municipality who could provide the best assessment how their jurisdiction is performing. Other people, including people with disabilities who reside in these communities, may have different opinions about the state of compliance in their city or town.

Lastly, the sample size of the survey was insufficient to draw statistical conclusions for many detailed dimensions. Ideally, we would have liked to present statistics about Title II requirements broken down by population size in each state, however, the small sample of large cities and towns in Maine, New Hampshire, and Vermont and small towns in Rhode Island, combined with even moderate levels of item nonresponse, result in margins of error too large to conclude much of anything.

Recommendation

From this study, we have identified area of “low hanging fruit” with which organizations like the New England ADA Center can embark on interventions to help improve compliance with Title II requirements. Given tight budgets, it is a relief to learn that the problem of compliance is not solved by simply throwing money at it. Furthermore, the kinds of interventions needed are generally in line with the expertise of the ADA centers. Because the areas of need and reasons for noncompliance appear readily fixable with existing resources, like the New England ADA Center's Title II Action Guide, focus should be placed on how to engage municipal

representatives with those resources to see requirements implemented.

One way this can be done is take the daunting task of coming into full compliance and break it into its components elements, each less difficult to achieve than the whole. To start, the interventions can focus on helping municipalities with posting a notice of ADA compliance and implementing a complaint procedure. This can be addressed with sample document templates, found in the Title II Action Guide. Implementing these documents directly address two areas of compliance that require little administrative or financial demands. Furthermore, this easy task can serve as an introduction to the other support that the ADA Center can provide. The next area of focus for the intervention would be informing a municipality about how to conduct a self-evaluation or develop a transition plan. Again, the Title II Action guide provides the necessary information for municipalities to get started, however, more may be necessary. Webinars and more active learning opportunities may help municipalities engage with available resources. In the next phase of our project, we intend to design and implement such an intervention, and then assess whether those efforts are successful in moving the needle on municipal compliance with Title II.

Appendix Tables

Appendix Table 1.A: Compliance with Administrative and SPA Accessibility Requirements - Weighted

	Total	CT	ME	MA	NH	RI	VT
Overall Compliance	7.5	26.0	4.0	10.4	5.0	8.3	-
Met all Administrative Requirements	23.7	51.9	18.4	29.5	18.7	8.3	14.0
Met all SPA Accessibility Requirements	16.6	32.1	7.0	19.4	10.0	24.8	26.3
Has 50+ Employees							
Met all 5 Admin Reqs (compliant)	33.8	55.6	47.7	29.3	28.4	9.5	26.9
1 or 2 req(s) short (near compliant)	36.6	26.8	10.8	39.1	34.9	62.1	50.0
3+ reqs short (not compliant)	29.6	17.6	41.5	31.6	36.7	28.4	23.1
Has <50 Employees							
Met both admin reqs (compliant)	16.2	43.8	15.4	30.4	10.7	-	9.0
Met only 1 req (near compliant)	35.4	31.4	31.9	19.0	32.1	-	55.2
Met neither req (not compliant)	48.4	24.8	52.7	50.6	57.2	-	35.8
Reasons for noncompliance							
Lack of money	34.5	13.5	39.9	33.8	28.9	45.0	39.3
Lack of personnel	40.9	29.5	47.6	35.3	38.2	27.0	45.7
Lack of knowledge	35.9	21.8	49.7	38.7	32.9	9.0	19.9
Lack of time	25.2	13.2	31.6	28.6	26.8	27.0	12.9
Reactive accessibility*	7.9	0.0	5.2	13.3	15.4	32.0	0.0
Small town*	5.7	5.2	4.2	3.2	19.7	0.0	0.0
In progress*	7.5	8.0	0.0	15.3	9.2	32.0	6.5
Other	24.9	32.6	9.3	42.2	41.2	77.0	6.5

Appendix Table 1.B: Compliance with Administrative and SPA Accessibility Requirements - Unweighted

	Total	CT	ME	MA	NH	RI	VT
N	319	39	99	113	36	11	21
Overall Compliance	9.1	25.6	4.0	10.6	5.6	9.1	0.0
Met all Administrative Requirements	26.3	51.3	18.2	30.1	19.4	9.1	19.0
Met all SPA Accessibility Requirements	17.2	33.3	7.1	20.4	11.1	27.3	23.8
Has 50+ Employees							
N	166	30	8	93	17	10	8
Met all Admin Reqs (compliant)	34.3	53.3	50.0	30.1	29.4	10.0	37.5
1 or 2 reqs short (near compliant)	37.3	30.0	12.5	38.7	35.3	60.0	50.0
3+ reqs short (not compliant)	28.3	16.7	37.5	31.2	35.3	30.0	12.5
Has <50 Employees							
N	153	9	91	20	19	1	13
Met all admin reqs (compliant)	17.6	44.4	15.4	30.0	10.5	0.0	7.7
Some reqs met (near compliant)	32.7	33.3	31.9	20.0	31.6	0.0	61.5
No reqs met (not compliant)	49.7	22.2	52.7	50.0	57.9	100.0	30.8
Reasons for noncompliance							
Lack of money	33.8	13.8	40.0	33.7	29.4	50.0	33.3
Lack of personnel	38.6	27.6	47.4	34.7	38.2	30.0	38.1
Lack of knowledge	37.2	24.1	49.5	37.6	32.4	10.0	19.0
Lack of time	25.9	10.3	31.6	27.7	26.5	30.0	9.5
Reactive accessibility*	9.0	0.0	5.3	12.9	14.7	30.0	0.0
Small town*	5.2	3.4	4.2	3.0	20.6	0.0	0.0
In progress*	8.6	6.9	0.0	15.8	8.8	30.0	4.8
Other	29.3	34.5	9.5	42.6	41.2	80.0	4.8

Appendix Table 2.A: Correlations Across Requirements

	Coordinator	Complaint	Notify	Self-eval	Trans Plan	Voting	Emerg Mgmt	Shelters	Communication
Complaint	0.200	-	-	-	-	-	-	-	-
Notify	0.075	0.294	-	-	-	-	-	-	-
Self-eval	0.180	0.122	0.208	-	-	-	-	-	-
Trans Plan	0.135	0.261	0.145	0.465	-	-	-	-	-
Voting	-0.104	0.049	0.032	-0.030	-0.061	-	-	-	-
Emerg Mgmt	0.081	0.204	0.199	0.131	0.066	0.158	-	-	-
Shelters	0.047	-0.101	0.166	-0.236	-0.277	0.237	0.087	-	-
Communication	0.494	0.245	0.064	0.166	0.270	-0.065	0.202	-0.136	-
Website	0.015	-0.039	0.192	0.124	-0.076	-0.016	0.011	0.085	0.001

Appendix Table 3.A: Individual Administrative and SPA Accessibility Requirements - New England

	N	Unweighted									Weighted								
		Compliant	Reasons for noncompliance								Compliant	Reasons for noncompliance							
			Money	Personnel	Knowledge	Time	Reactive	Small town	In progress	Other		Money	Personnel	Knowledge	Time	Reactive	Small town	In progress	Other
Administrative requirements for all municipalities																			
Self-evaluation	319	44.2	33.3	41.9	46.2	35.9	0.9	5.1	4.3	13.7	40.7	30.8	46.0	43.3	33.5	1.2	6.1	2.5	10.0
Notification procedure	319	51.1	21.8	28.2	45.5	23.6	6.4	5.5	3.6	14.5	49.6	21.2	25.8	47.3	24.2	6.0	6.0	2.1	16.0
Administrative requirements for municipalities with 50+ employees																			
ADA coordinator	166	94.0	28.6	71.4	42.9	14.3	0.0	0.0	0.0	42.9	93.4	26.9	69.3	42.2	11.5	0.0	0.0	0.0	28.7
Complaint procedure	166	80.1	13.3	26.7	40.0	0.0	0.0	0.0	13.3	33.3	79.1	12.9	36.8	46.4	0.0	0.0	0.0	9.3	27.7
Transition plan	166	47.0	30.4	23.9	34.8	26.1	6.5	0.0	17.4	23.9	45.0	25.6	21.0	35.5	26.5	4.5	0.0	20.0	22.5
SPA requirements for all municipalities																			
Accessible polling places	319	90.6	-	-	-	-	-	-	-	-	92.4	-	-	-	-	-	-	-	-
Accessible emergency shelters	249	77.5	-	-	-	-	-	-	-	-	80.1	-	-	-	-	-	-	-	-
Accessible website	319	34.5	15.2	17.0	19.6	6.2	0.9	0.0	8.0	17.0	33.8	15.8	17.7	20.2	6.2	0.5	0.0	7.7	16.1
Emergency management plans	316	76.9	-	-	-	-	-	-	-	-	77.0	-	-	-	-	-	-	-	-
Arrange effective communication	319	66.5	24.2	59.1	24.2	10.6	1.5	1.5	0.0	21.2	62.0	24.0	65.6	21.2	6.8	1.8	1.3	0.0	14.3

Appendix Table 3.B: Individual Administrative and SPA Accessibility Requirements - Connecticut

	N	Unweighted									Weighted								
		Compliant	Reasons for noncompliance								Compliant	Reasons for noncompliance							
			Money	Personnel	Knowledge	Time	Reactive	Small town	In progress	Other		Money	Personnel	Knowledge	Time	Reactive	Small town	In progress	Other
Administrative requirements for all municipalities																			
Self-evaluation	39	69.2	20.0	20.0	40.0	0.0	0	0	0.0	40	69.9	20.0	20.0	40.0	0.0	0	0.0	0.0	40.0
Notification procedure	39	76.9	0.0	0.0	50.0	0.0	0	50	0.0	0	74.3	0.0	0.0	34.6	0.0	0	65.4	0.0	0.0
Administrative requirements for municipalities with 50+ employees																			
ADA coordinator	30	96.7	-	-	-	-	-	-	-	-	97.0	0.0	0.0	0.0	0.0	0	0.0	0.0	0.0
Complaint procedure	30	83.3	0.0	0.0	100.0	0.0	0	0	0.0	0	82.4	0.0	0.0	100.0	0.0	0	0.0	0.0	0.0
Transition plan	30	66.7	33.3	33.3	66.7	0.0	0	0	0.0	0	67.6	33.3	33.3	66.7	0.0	0	0.0	0.0	0.0
SPA requirements for all municipalities																			
Accessible polling places	39	89.7	-	-	-	-	-	-	-	-	91.8	-	-	-	-	-	-	-	-
Accessible emergency shelters	31	80.6	-	-	-	-	-	-	-	-	78.7	-	-	-	-	-	-	-	-
Accessible website	39	48.7	12.5	25.0	37.5	12.5	0	0	12.5	50	48.1	17.7	27.1	36.5	17.7	0	0.0	9.4	54.2
Emergency management plans	39	79.5	-	-	-	-	-	-	-	-	81.8	-	-	-	-	-	-	-	-
Arrange effective communication	39	79.5	33.3	66.7	33.3	0.0	0	0	0.0	0	76.3	20.9	79.1	20.9	0.0	0	0.0	0.0	0.0

Appendix Table 3.C: Individual Administrative and SPA Accessibility Requirements - Maine

	N	Unweighted									Weighted								
		Compliant	Reasons for noncompliance								Compliant	Reasons for noncompliance							
			Money	Personnel	Knowledge	Time	Reactive	Small town	In progress	Other		Money	Personnel	Knowledge	Time	Reactive	Small town	In progress	Other
Administrative requirements for all municipalities																			
Self-evaluation	99	29.3	44.4	51.9	51.9	42.6	0.0	3.7	0	0.0	29.8	44.9	52.2	52.2	43.0	0.0	3.7	0	0.0
Notification procedure	99	40.4	27.1	29.2	45.8	31.2	8.3	4.2	0	8.3	40.7	26.8	28.9	46.3	31.9	8.3	4.1	0	8.3
Administrative requirements for municipalities with 50+ employees																			
ADA coordinator	8	75.0	50.0	50.0	50.0	0.0	0.0	0.0	0	0.0	73.8	41.2	41.2	58.8	0.0	0.0	0.0	0	0.0
Complaint procedure	8	75.0	50.0	100.0	50.0	0.0	0.0	0.0	0	50.0	73.8	41.2	100.0	58.8	0.0	0.0	0.0	0	41.2
Transition plan	8	50.0	100.0	100.0	100.0	50.0	0.0	0.0	0	0.0	47.7	100.0	100.0	100.0	58.8	0.0	0.0	0	0.0
SPA requirements for all municipalities																			
Accessible polling places	99	98.0	-	-	-	-	-	-	-	-	97.6	-	-	-	-	-	-	-	-
Accessible emergency shelters	67	86.6	-	-	-	-	-	-	-	-	85.6	-	-	-	-	-	-	-	-
Accessible website	99	18.2	8.3	6.7	18.3	0.0	0.0	0.0	0	3.3	18.8	8.3	6.7	18.3	0.0	0.0	0.0	0	3.3
Emergency management plans	99	83.8	-	-	-	-	-	-	-	-	83.2	-	-	-	-	-	-	-	-
Arrange effective communication	99	63.6	30.8	61.5	19.2	3.8	0.0	0.0	0	7.7	63.2	31.4	62.8	21.8	5.3	0.0	0.0	0	7.4

Appendix Table 3.D: Individual Administrative and SPA Accessibility Requirements - Massachusetts

	N	Unweighted										Weighted							
		Compliant	Reasons for noncompliance									Compliant	Reasons for noncompliance						
			Money	Personnel	Knowledge	Time	Reactive	Small town	In progress	Other	Money		Personnel	Knowledge	Time	Reactive	Small town	In progress	Other
Administrative requirements for all municipalities																			
Self-evaluation	113	53.1	32.4	29.4	47.1	35.3	0.0	0	11.8	29.4	52.8	30.8	28.2	47.0	35.9	0.0	0	11.1	29.9
Notification procedure	113	50.4	20.0	32.5	42.5	17.5	5.0	0	10.0	17.5	49.0	19.4	31.2	44.4	17.4	4.9	0	9.0	18.8
Administrative requirements for municipalities with 50+ employees																			
ADA coordinator	93	95.7	25.0	75.0	50.0	25.0	0.0	0	0.0	75.0	95.4	28.6	78.6	50.0	28.6	0.0	0	0.0	71.4
Complaint procedure	93	80.6	12.5	12.5	25.0	0.0	0.0	0	25.0	37.5	80.5	12.0	12.0	28.0	0.0	0.0	0	24.0	36.0
Transition plan	93	46.2	33.3	22.2	33.3	22.2	11.1	0	18.5	22.2	46.3	31.4	20.9	36.1	22.1	10.5	0	17.4	22.1
SPA requirements for all municipalities																			
Accessible polling places	113	83.2	-	-	-	-	-	-	-	-	82.6	-	-	-	-	-	-	-	-
Accessible emergency shelters	89	68.5	-	-	-	-	-	-	-	-	68.2	-	-	-	-	-	-	-	-
Accessible website	113	44.2	24.0	28.0	24.0	12.0	4.0	0	16.0	32.0	43.8	23.6	27.0	24.7	12.4	3.4	0	15.7	33.7
Emergency management plans	111	69.4	-	-	-	-	-	-	-	-	69.6	-	-	-	-	-	-	-	-
Arrange effective communication	113	68.1	26.3	47.4	42.1	31.6	0.0	0	0.0	47.4	67.1	25.4	46.3	43.3	31.3	0.0	0	0.0	46.3

Appendix Table 3.E: Individual Administrative and SPA Accessibility Requirements - New Hampshire

	N	Unweighted									Weighted								
		Compliant	Reasons for noncompliance								Compliant	Reasons for noncompliance							
			Money	Personnel	Knowledge	Time	Reactive	Small town	In progress	Other		Money	Personnel	Knowledge	Time	Reactive	Small town	In progress	Other
Administrative requirements for all municipalities																			
Self-evaluation	36	33.3	7.7	38.5	46.2	23.1	7.7	30.8	0.0	15.4	32.5	8.1	35.6	46.0	21.8	8.1	29.9	0.0	16.1
Notification procedure	36	41.7	14.3	21.4	42.9	21.4	7.1	21.4	0.0	28.6	42.1	13.0	18.4	43.5	20.6	7.6	18.4	0.0	30.5
Administrative requirements for municipalities with 50+ employees																			
ADA coordinator	17	88.2	0.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	89.0	0.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Complaint procedure	17	76.5	0.0	50.0	50.0	0.0	0.0	0.0	0.0	0.0	76.1	0.0	50.0	50.0	0.0	0.0	0.0	0.0	0.0
Transition plan	17	41.2	0.0	0.0	33.3	33.3	0.0	0.0	0.0	33.3	39.4	0.0	0.0	35.0	35.0	0.0	0.0	0.0	29.9
SPA requirements for all municipalities																			
Accessible polling places	36	97.2	-	-	-	-	-	-	-	-	97.1	-	-	-	-	-	-	-	-
Accessible emergency shelters	33	84.8	-	-	-	-	-	-	-	-	85.1	-	-	-	-	-	-	-	-
Accessible website	36	22.2	15.4	30.8	7.7	15.4	0.0	0.0	23.1	30.8	19.9	15.7	29.2	7.9	15.7	0.0	0.0	23.6	31.5
Emergency management plans	36	75.0	-	-	-	-	-	-	-	-	74.6	-	-	-	-	-	-	-	-
Arrange effective communication	36	66.7	0.0	55.6	11.1	0.0	11.1	11.1	0.0	22.2	67.5	0.0	52.5	11.9	0.0	11.9	8.4	0.0	23.8

Appendix Table 3.F: Individual Administrative and SPA Accessibility Requirements - Rhode Island

	N	Unweighted									Weighted								
		Compliant	Reasons for noncompliance								Compliant	Reasons for noncompliance							
			Money	Personnel	Knowledge	Time	Reactive	Small town	In progress	Other		Money	Personnel	Knowledge	Time	Reactive	Small town	In progress	Other
Administrative requirements for all municipalities																			
Self-evaluation	11	27.3	20.0	20.0	20.0	60.0	0	0	20.0	40.0	29.3	20.0	20.0	20.0	60.0	0	0	20.0	40
Notification procedure	11	81.8	-	-	-	-	-	-	-	-	78.9	0.0	0.0	0.0	0.0	0	0	0.0	0
Administrative requirements for municipalities with 50+ employees																			
ADA coordinator	10	90.0	-	-	-	-	-	-	-	-	90.5	0.0	0.0	0.0	0.0	0	0	0.0	0
Complaint procedure	10	80.0	0.0	0.0	0.0	0.0	0	0	0.0	100.0	81.0	0.0	0.0	0.0	0	0	0.0	100	
Transition plan	10	10.0	28.6	28.6	14.3	42.9	0	0	28.6	42.9	9.5	26.5	26.5	13.2	39.7	0	0	26.5	47
SPA requirements for all municipalities																			
Accessible polling places	11	90.9	-	-	-	-	-	-	-	-	87.2	-	-	-	-	-	-	-	-
Accessible emergency shelters	10	80.0	-	-	-	-	-	-	-	-	75.8	-	-	-	-	-	-	-	-
Accessible website	11	36.4	50.0	25.0	0.0	25.0	0	0	25.0	25.0	33.0	43.9	22.0	0.0	22.0	0	0	34.1	22
Emergency management plans	11	81.8	-	-	-	-	-	-	-	-	78.9	-	-	-	-	-	-	-	-
Arrange effective communication	11	81.8	0.0	0.0	0.0	0.0	0	0	0.0	100.0	83.5	0.0	0.0	0.0	0.0	0	0	0.0	100

Appendix Table 3.G: Individual Administrative and SPA Accessibility Requirements - Vermont

	N	Unweighted									Weighted								
		Compliant	Reasons for noncompliance								Compliant	Reasons for noncompliance							
			Money	Personnel	Knowledge	Time	Reactive	Small town	In progress	Other		Money	Personnel	Knowledge	Time	Reactive	Small town	In progress	Other
Administrative requirements for all municipalities																			
Self-evaluation	21	47.6	16.7	66.7	16.7	16.7	0	0	0	0.0	34.9	16.7	66.7	16.7	16.7	0	0	0	0.0
Notification procedure	21	57.1	16.7	16.7	66.7	16.7	0	0	0	16.7	53.8	19.7	19.7	60.6	19.7	0	0	0	19.7
Administrative requirements for municipalities with 50+ employees																			
ADA coordinator	8	100.0	-	-	-	-	-	-	-	-	100.0	0.0	0.0	0.0	0.0	0	0	0	0.0
Complaint procedure	8	75.0	-	-	-	-	-	-	-	-	75.0	0.0	0.0	0.0	0.0	0	0	0	0.0
Transition plan	8	37.5	0.0	0.0	0.0	0.0	0	0	100	0.0	26.9	0.0	0.0	0.0	0.0	0	0	100	0.0
SPA requirements for all municipalities																			
Accessible polling places	21	85.7	-	-	-	-	-	-	-	-	92.5	-	-	-	-	-	-	-	-
Accessible emergency shelters	19	68.4	-	-	-	-	-	-	-	-	82.7	-	-	-	-	-	-	-	-
Accessible website	21	52.4	50.0	50.0	50.0	0.0	0	0	0	0.0	53.2	50.0	50.0	50.0	0.0	0	0	0	0.0
Emergency management plans	20	80.0	-	-	-	-	-	-	-	-	74.0	-	-	-	-	-	-	-	-
Arrange effective communication	21	38.1	25.0	87.5	12.5	0.0	0	0	0	0.0	33.9	28.2	85.9	14.1	0.0	0	0	0	0.0