



Wisconsin Elections Commission

Barriers Faced by Elderly Voters and Voters with Disabilities

June 2023



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Executive Summary

In 1999, Wis. Stat. 5.25(4)(d) was amended to require the state elections agency to submit a report on impediments to voting faced by elderly voters and voters with disabilities to the appropriate standing committees of the legislature under s. 13.172 (3). The statute also requires the Commission to consult with appropriate advocacy groups representing the elderly and disability community when preparing this report. The concept for this report originated as one of several recommendations made by the Legislative Council's Special Committee to Review the Election Process. The Special Committee was established in 1998. This recommendation, along with several other election initiatives recommended by the Special Committee and the former State Elections Board, was enacted into law with 1999 Wisconsin Act 182.

The goal of this report is to provide information regarding the accessibility of Wisconsin polling places. This report will analyze data from the Wisconsin Elections Commission (WEC) polling place review program (formerly called the polling place audit program), which first began in 2009, and provide updates on additional agency efforts designed to ensure access to the polls. In 2022, the accessibility program established a goal of 330 polling place accessibility reviews by the November 8th, 2022 election, a plan which was approved by the Wisconsin Elections Commission. Due to increased participation by organizations on the Accessibility Advisory Committee like Disability Rights Wisconsin and the Wisconsin Coalition of Independent Living Centers, a total of 421 polling places were reviewed. This report will also showcase other aspects of the agency's accessibility program, including an overview of the work done by the WEC Accessibility Advisory Committee.

The WEC accessibility program has four pillars: the polling place accessibility review program, the supply program, the Accessibility Advisory Committee, and training. Each pillar focuses on providing resources for clerks to ensure that every portion of the voting process is accessible and to identify areas for improvement.

In accordance with the statutory mandate to consult with appropriate advocacy groups, Commission staff met regularly with the Accessibility Advisory Committee (AAC) throughout 2022 and 2023 to identify areas of improvement and strengthen existing resources. The work of the committee is essential to the WEC's understanding of accessible voting issues and allows the agency to partner with organizations which provide both insight and access to voters who may face barriers to participation in Wisconsin elections. This partnership increases the effectiveness and scope of public outreach efforts designed to ensure that elderly voters and voters with disabilities can participate in the electoral process. Focus was placed on prioritizing accessibility in training materials and manuals to increase awareness of the barriers faced by elderly voters and voters with disabilities.

Over the past 14 years, polling place reviews have been conducted in a vast majority of municipalities and in all 72 counties in Wisconsin. Polling place reviews historically have been conducted by WEC staff, temporary staff, and volunteers from Disability Rights Wisconsin. These on-site reviews take place on Election Day and allow trained individuals to assess a polling place using a survey that breaks down the parts of a polling place a voter needs to use.

Commission staff reports these findings to each surveyed municipality and uses these results to update training materials and identify areas needing improvement throughout Wisconsin.

Between the 2022 Spring Primary and the 2022 General Election, 421 polling place reviews were conducted. The review program visited 333 municipalities in 44 counties. These reviews identified 2,495 total problems for an average of 5.9 problems per polling place. Due to the Covid-19 pandemic, only 46 reviews were conducted in 2020 and 2021 which does not provide an accurate comparison. The last time reviews were conducted at this scale was between the 2016 Spring Primary and the 2019 Spring Election. In that period the review program visited 335 municipalities and identified 2,851 total problems for an average of 6.42 problems per polling place. In the 2022 election cycle only two fewer polling places were visited but there were 356 fewer problems identified.

Municipalities across the state have made improvements at their polling places in direct response to the polling place review results. Plans of Action to resolve issues raised in the polling place review have shown that municipalities have worked to replace inaccessible pathways, door hardware, and ramps. The WEC continued to provide resources like the Polling Place Accessibility Self-Assessment for clerks to independently identify inaccessible aspects of their polling places. Clerks continued to take advantage of the supply program which provides various items to improve access to their polling place, such as doorbells, cones, and parking or entrance signs at no cost to the municipality. The accessibility reviews and supply program have also drawn attention to accessibility concerns that have low or no-cost remedies, such as keeping interior corridors and voting areas free from obstacles or protrusions on Election Day, clearing leaves, snow, and/or ice from accessible pathways, and providing training to election inspectors on best practices when interacting with elderly voters and individuals with disabilities.

The Wisconsin Elections Commission will continue to work with policymakers, local election officials, and community organizations to assure Wisconsin's voters that all polling places will be accessible. These improvements promoted by changes in law and increased education will help to eliminate barriers faced by Wisconsin's elderly and voters with disabilities.

Legal Environment

In 1965, Congress passed the Voting Rights Act (VRA), a sweeping civil rights law that attempted to address the challenges facing many voters, including those with disabilities. The VRA authorized voting assistance for voters with disabilities who would otherwise have difficulty casting a ballot, provided the assister is not the voter's employer or agent of the voter's employment union. 42 U.S.C. § 1973 aa-6. This requirement was subsequently codified at the state level in Wis. Stat. § 6.82.

In 1975, the Legislature amended the election code to permit voters with physical disabilities to cast a ballot at the door of the polling place if the polling place was not accessible to persons in wheelchairs. This process is otherwise known as curbside voting. 1975 Wisconsin Act 275, § 3. That same legislation recognized physical disability as a basis for registering to vote by mail and voting absentee. 1975 Wisconsin Act 275, § 2. It also permitted voters with disabilities to request

that an absentee ballot be sent to them automatically for each election if they self-certify as “indefinitely confined” to their homes due to age, physical illness, infirmity, or disability. *Id.*

In 1985, the Legislature required all polling places to be accessible to persons in wheelchairs. 1985 Wisconsin Act 304, § 17g. This legislation also authorized municipal clerks to appoint Special Voting Deputies to administer absentee voting in nursing homes. 1985 Wisconsin Act 304, § 74m.

In 1989, the Legislature broadened the language of Wis. Stat. § 5.25 and required that all polling places be accessible to elderly individuals and individuals with disabilities by January 1, 1992. 1989 Wisconsin Act 192, §§ 4, 86. The State Elections Board was given the authority to exempt a polling place from this requirement in accordance with guidelines developed by administrative rule. 1989 Wisconsin Act 192, § 5. This legislation also permitted municipal clerks to reassign an elector to another polling place within the municipality in order to permit an elderly individual or an individual with a disability to utilize an accessible polling place. 1989 Wisconsin Act 192, § 7.

In 1990, Congress passed the Americans with Disabilities Act (ADA), a wide-ranging civil rights law that in part requires public entities to make reasonable modifications to policies, practices, or procedures to avoid discrimination against people with disabilities. 42 U.S.C. §§ 12101-12213. The ADA also requires that people with disabilities not be excluded from participating in any public program, service, or activity. 42 U.S.C. §§ 12101-12213.

In 1991 the Legislature directed any municipal clerk who planned to use an inaccessible polling place to file a written report with the State Elections Board describing the municipality's plans to make the polling place accessible. 1991 Wisconsin Act 39, § 9118(1g).

Under the conditions provided by the administrative rules and legislation passed in the 1980s and 1990s, the former State Elections Board determined that by 1998 the degree of polling place accessibility in Wisconsin had significantly improved.¹ However, the Help America Vote Act of 2002 (HAVA) instituted more rigorous requirements for polling place accessibility, leading to recognition that many polling places still present challenges to voters with disabilities who wish to vote independently and privately.

HAVA also provided funds to modernize voting systems across the country in reaction to the electoral problems of the 2000 General Election. HAVA required that the voting system used at each polling place permits all individuals to vote privately and independently. 42 U.S.C. 15481. For many voters with disabilities, this new generation of voting equipment enabled them to vote for the first time without assistance from another person.

In 2003, the Legislature incorporated the HAVA requirements into state law and further broadened access to voting. 2003 Wisconsin Act 265. This legislation permitted individuals with a disability to notify a municipal clerk that they intend to vote at a polling place and to request a specific accommodation that would facilitate voting. 2003 Wisconsin Act 265, § 14. It also required the municipal clerk to make reasonable efforts to comply with such requests for voting

¹ Wisconsin State Elections Board, *Polling Place Accessibility in the 1998 Election*.

accommodations made by individuals with disabilities whenever feasible. 2003 Wisconsin Act 265, § 124.

In 2011, the Legislature required most electors to provide proof of identification before receiving a ballot. 2011 Wisconsin Act 23, § 45. Absentee voters who live in a qualified care facility served by special voting deputies or voters who certify they are indefinitely confined because of age, illness, disability, or infirmity may have the witness to their absentee voting verify the voter's identity. 2011 Wisconsin Act 23, §§ 68, 71. Additionally, this legislation required that all electors enter their signature on the poll list before receiving a ballot. 2011 Wisconsin Act 23, § 45.

However, it provides that electors who cannot meet this requirement due to disability may be exempted. 2011 Wisconsin Act 23, § 46. Finally, this legislation also expanded the types of care facilities that are served by special voting deputies to include qualified residential care apartment complexes and qualified adult homes. 2011 Wisconsin Act 23, § 75. Act 23 also required that voters show certain photo identification in order to vote at a polling place or to obtain an absentee ballot. Due to litigation, the photo identification portion of Act 23 was not enforced until after the April 7, 2015 election. 2011 Wisconsin Act 23, § 75.

The Legislature authorized Online Voter Registration (OVR) in accordance with Wis. Stat. § 6.30(5) as required by 2015 Wisconsin Act 261. State law now provides that eligible voters who hold a valid State of Wisconsin Driver License or State ID Card (WI DL/ID) that has their current name and address on file with the Wisconsin Department of Motor Vehicles (WI DMV) can register to vote online. The WEC's OVR system became available in January 2017 as a feature of the My Vote Wisconsin website (MyVote.wi.gov).

The Wisconsin Elections Commission was awarded a yearly HAVA grant for accessibility programming at roughly \$200,000 for several years. By the end of FY2018, the majority of HAVA funds had expired, but the Wisconsin Elections Commission made a request in its executive budget to continue funding the accessibility review program and supply program, at approximately \$48,300 for FY19.² These funds were approved, but were less than the funds provided by HAVA, which had previously allowed WEC to hire additional temporary staff to review polling places. The amount of funding approved from the executive budget allows WEC to continue the polling place review program without grant funds, at every statewide election. Additionally, WEC made the commitment to continue requesting funds for this program in the future.

Wis. Stat. § 6.79(2)(a) originally stated that electors must state their full name and address and present proof of identification to the election official when checking in at their polling place. The ability of voters with some disabilities to have an assistant state their name and address for them became law in 2019. The 2019 Wisconsin Act 48 amended the statute to say, “**6.79 (8) VOTER UNABLE TO STATE NAME AND ADDRESS.** An elector is not required to state his or her name and address under sub. (2) (a) if the elector is unable to do so, but an election official, or another person selected by the elector, shall state the elector's name and address after the election official

² The Agency Budget Request for 2017-2019 can be found at https://elections.wi.gov/sites/elections.wi.gov/files/publication/128/2017_19_wec_budget_submission_pdf_14351.pdf.

verifies the elector's proof of identification under sub. (2) (a)." The new statute eliminates a barrier for voters who are unable to state their name and address.³

In July 2020, the Seventh Circuit Court of Appeals issued a decision on the *One Wisconsin Institute* case that clarified several voting laws. One of these clarifications included a restriction that only allowed the sending of emailed and faxed ballots to military and overseas voters. Under the prior injunction, there was no prohibition on a clerk sending regular voters a ballot by email, but clerks were also not required to fulfil those requests. These emailed ballots were able to be tagged and allowed a voter to use a screen reader to mark their ballot. Voters were still required to print, sign, and have a witness sign the certification, and mail back their ballot to their clerk, but the emailed ballot allowed voters to independently fill out their absentee ballot. The *One Wisconsin Institute* decision eliminated this opportunity. The Wisconsin Elections Commission is exploring alternative options for a voter to fill out a ballot independently, including expanding access to a braille ballot and large print ballot.

In July 2022, the Wisconsin Supreme Court filed its opinion in *Richard Teigen et al. v. Wisconsin Elections Commission et al.*, 403 Wis.2d 607. The case largely focused on the legality of the use of secure absentee ballot drop boxes across the state, but the Court also examined Commission guidance relating to voter assistance with the mailing or returning of an absentee ballot by third parties. The Court affirmed the trial court's ruling that Wis. Stat. § 6.87(4)(b)1. allowed only two lawful methods for casting an absentee ballot. Those methods included the elector placing the envelope containing the ballot in the mail or returning it to the clerk personally. The Court did not address VRA allowances relating to return assistance for those with disabilities.

A second case, *Timothy Carey et al. v. Wisconsin Elections Commission et al.* (22-cv-cv-402jdp), provided additional confirmation that the provisions of the VRA can be lawfully applied to absentee ballot mailing and return assistance for disabled Wisconsin voters. The court, therefore, enjoined parties from enforcing Wis. Stat. § 6.87(4)(b)1. in a manner that would prevent a disabled voter from receiving assistance, unless the assister is the voter's employer or agent of that employer, or an agent of the voter's union.

Wisconsin Elections Commission Accessibility Program

The Wisconsin Elections Commission has created and maintained a multi-faceted program to improve polling place accessibility in Wisconsin. The Accessibility Program consists of four main initiatives: the Polling Place Accessibility Review Program, the Accessibility Advisory Committee, the Supply Program, and Clerk Support.

³ 2019 Wisconsin Act 48 can be found at <https://docs.legis.wisconsin.gov/2019/related/acts/48>.



POLLING PLACE
REVIEW PROGRAM



ACCESSIBILITY
ADVISORY
COMMITTEE



SUPPLY
PROGRAM



CLERK SUPPORT

The **Polling Place Review Program** reviews each zone of the polling place to ensure that it is accessible. Each polling place that is reviewed receives a list of any issues found and is required to submit a plan of action report to resolve each issue.

The **Accessibility Advisory Committee** is made up of local disability advocacy organizations that participate in meetings with the WEC multiple times per year. They provide vital feedback on materials and WEC initiatives that ensure we are prioritizing accessibility.

The **Supply Program** provides clerks with free accessibility supplies that include but are not limited to traffic cones, wireless doorbells, and signs for accessible entrances, parking, and curbside voting.

Lastly, **Clerk Support** is essential to the Accessibility Program. Training includes our Polling Place Accessibility Survey that clerks are required to fill out for new polling places, webinars, memos, curbside voting information, and other accessibility-focused training materials.

Polling Place Accessibility Reviews

All reviews are conducted using the Polling Place Accessibility Survey that was developed with the assistance of the WEC Accessibility Advisory Committee. The survey asks approximately 100 questions based upon the requirements outlined in the Americans with Disabilities Act, the Americans with Disabilities Act Accessibility Guidelines (ADAAG), the ADA Checklist for Polling Places, the ADA Guide for Small Towns, and Wisconsin Building Codes. Questions were designed to ensure that reviewers are able to answer questions accurately, regardless of their background knowledge of ADA. Reviewers are given a two-and-a-half day training to understand the survey and to learn how to complete the surveys quickly and accurately. This training includes a history and purpose of the review program, how to handle interactions with the chief inspector, how to evaluate polling place accessibility quickly and accurately, and a mock polling place review conducted in partnership with the City of Madison Clerk's Office. The survey is organized into five distinct polling place zones and categories within each zone. This allows a reviewer to answer questions that pertain to a specific location and disregard

questions that are not applicable to that location.⁴ Questions are designed to address physical accessibility targeted at areas that a voter may interact with on Election Day.

1. **Parking:** Includes off-street parking, drop-off zones, and on-street parking.
2. **Pathways:** Includes general pathway information, curb cuts, and ramps. General information includes the width of pathways, obstacles/hazards in pathways, and lighting.
3. **Accessible Entrance:** Includes doors, ramps, and threshold ramps that a voter may experience at the entrance of the building.
4. **Interior Route(s):** Includes corridors, doors, ramps, elevators, and wheelchair lifts. Corridors include signage, width, obstacles or hazards in pathways, and lighting. Elevators and wheelchair lifts consider controls or buttons, cab or lift space, and whether the elevator or lift is functional.
5. **Voting Area:** Includes notices, accessible setup, and accessible voting equipment. Notices include all required postings, including notices, maps and street directories, and sample ballots. Accessible setup includes accessibility of the paths of travel and the voting booth. Accessible voting equipment includes whether the voting equipment is set up, powered on, working and provides voter privacy.

In addition, WEC staff worked with the Accessibility Advisory Committee to assign a low, medium, or high severity ranking to each question. These determinations allow Commission staff to obtain a more nuanced understanding of the accessibility of each polling place. The severity rankings are defined as:

1. **Low Severity:** A low severity finding indicates a barrier that makes it more difficult for an elector with a disability to enter a polling place and cast a ballot privately and independently. Low-severity barriers are unlikely to prevent an elector with a disability from exercising their right to vote but do add extra burdens that are not faced by voters without disabilities.
2. **Medium Severity:** A medium severity finding indicates a barrier that makes it significantly more difficult for a voter with a disability to enter a polling place and cast a ballot privately and independently. Medium-severity barriers, especially in combination, can prevent a voter with a disability from exercising their right to vote and add significant burdens that are not faced by voters without disabilities.
3. **High Severity:** A high severity finding indicates a barrier that, in and of itself, would be likely to prevent a voter with a disability from entering a polling place and casting a ballot privately and independently.

After each election where reviews are conducted, WEC provides review findings to each municipality for each polling place visited. These reports detail the problems identified on Election Day and provide municipal clerks with suggested resolutions to these issues. Clerks are required to file a Plan of Action with the WEC that addresses all concerns outlined in the review report. WEC staff then reviews each Plan of Action and works with each municipality to ensure cost-effective and comprehensive solutions are put into place. Local election officials are

⁴ Full text of the clerk version of the Polling Place Accessibility Survey can be found on the WEC website at: <https://elections.wi.gov/clerks/guidance/accessibility/new-poling-place>

provided with the opportunity to order specific accessibility-related supplies to assist their efforts in remedying problems. Those supplies are purchased by the WEC using state funds and are sent to requesting municipalities at no cost to them. These supplies can include signature guides, page magnifiers, wireless doorbells, cones, and various signs for parking areas, pathways, and accessible entrances.

Until the 2014 Partisan Primary, paper reports were generated for each review conducted. To address the high administrative burden of this paper-based system, elections staff worked to develop an electronic platform for reporting review results to local election officials. The Polling Place Accessibility Reporting System was launched in early 2015 and allows clerk users to view reports online, file their Plan of Action electronically, and access reference materials to explain and aid polling place accessibility efforts. The System allows staff to customize reports with specific explanations of problems and photos taken during site visits, leveraging the use of technology to improve the efficiency and effectiveness of the review program.

All reviewers are provided with tablets to simplify the process of sending the survey to the clerk. This customizable format of the electronic survey allows reviewers to logically skip portions of the survey that do not apply to the polling place, such as skipping an off-street parking section if the polling place does not have off-street parking. Another benefit of using tablets is that reviewers can efficiently take photos of each polling place and accessibility concerns. In 2023, the WEC purchased upgraded Windows Surface tablets for use in 2024. These tablets provide reviewers with higher photo quality, increased battery life, and improved features to simplify the reviewing process and increase the quality of the data collected.

WEC staff are currently working on a redesign process to update the Access Elections data storage website and the tablet software used to support the site review program. This site also allows clerks to see their site review problems and submit plans of action in response to each problem. Staff plan to improve the tablet application, redesign the clerk portal, and simplify the process of downloading and analyzing data to create more efficient processes for verifying and providing the results of site reviews to municipalities. The anticipated completion timeline for this project is late 2023. These improvements will allow for increased usability by comparing past accessibility reviews from the same polling place and improve user experience on the website.

Polling Place Accessibility Reviews 2022-2023 Summary

In 2022 and 2023 the WEC fostered partnerships with Disability Rights Wisconsin and the Wisconsin Coalition of Independent Living Centers. Staff from both organizations participated in the review program providing expertise from their work in disability rights and ADA compliance.

In total 551 polling places were reviewed in 2022-2023:

- 37 at the 2022 Spring Primary.
- 76 at the 2022 Spring Election.
- 129 at the 2022 Partisan Primary.
- 178 at the 2022 General Election.
- 63 at the 2023 Spring Primary
- 53 at the 2023 Spring Election
- 15 at the 2023 Special Election Milwaukee County Supervisor

These polling places were spread across 379 municipalities in 47 counties. The data collected mirrored many of the same trends from data collected in previous election cycles. There were 3,062 non-compliant findings at the 551 polling places averaging 5.6 non-compliant findings per polling place with a median of 5 non-compliant findings per polling place.

Figure 1: Counties Visited 2022-2023

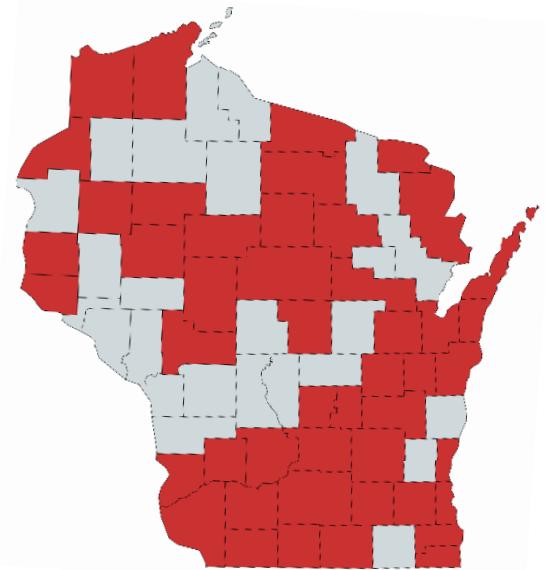
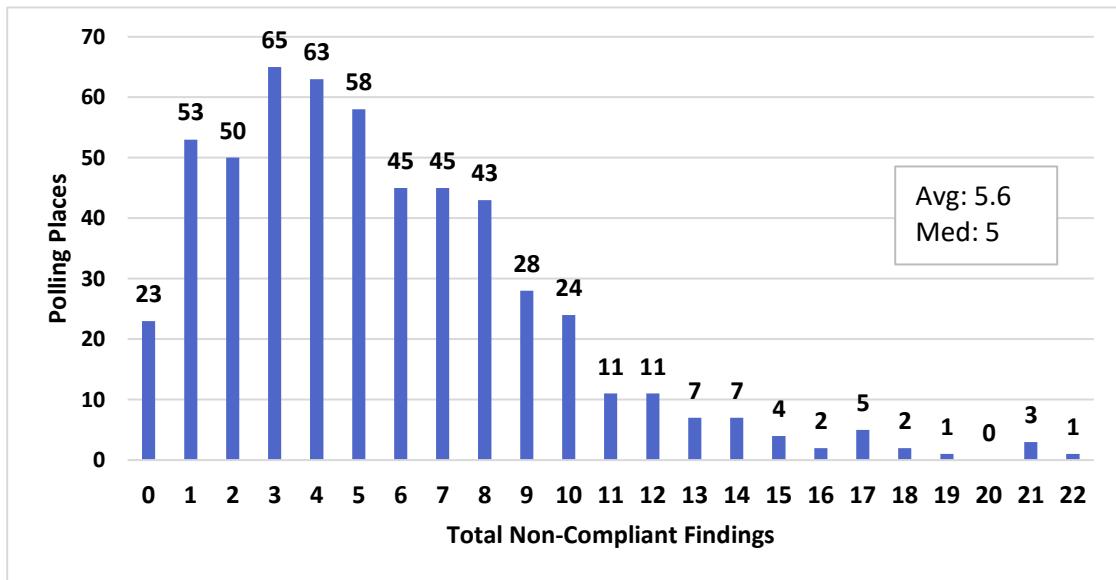


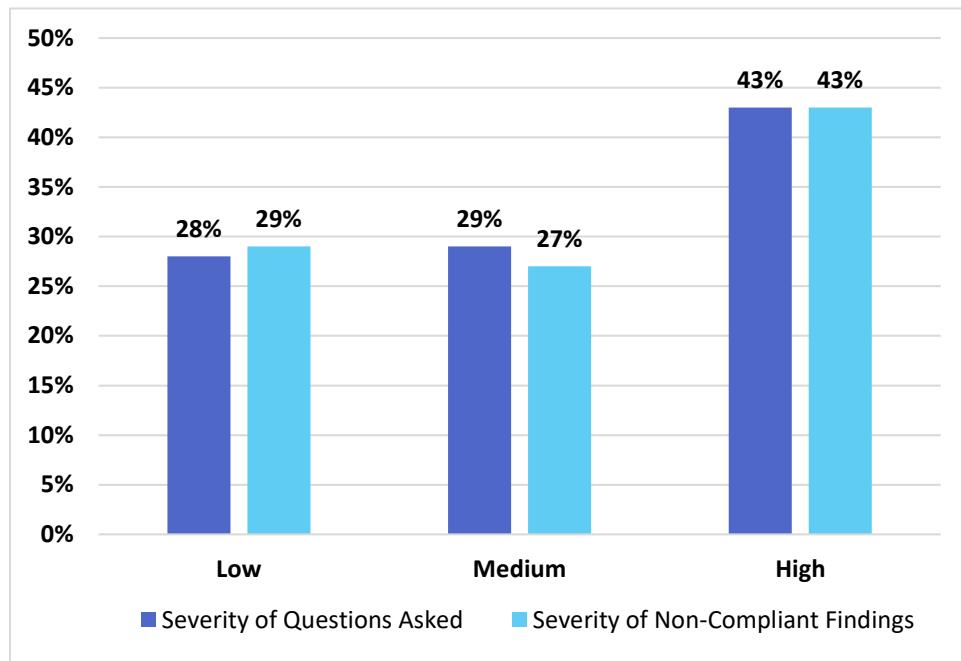
Figure 2: Frequency of Total Non-Compliant Findings in Polling Places Reviewed 2022-2023



The average is down from 7 non-compliant findings per polling place in 2020. Data shows there tend to be more non-compliant findings in years with presidential elections. Higher voter turnout causes polling places to be more crowded, and reduced space negatively impacts accessibility for voters with mobility aids, like wheelchairs and walkers. Less room to maneuver can also decrease privacy at accessible voting booths and accessible voting equipment.

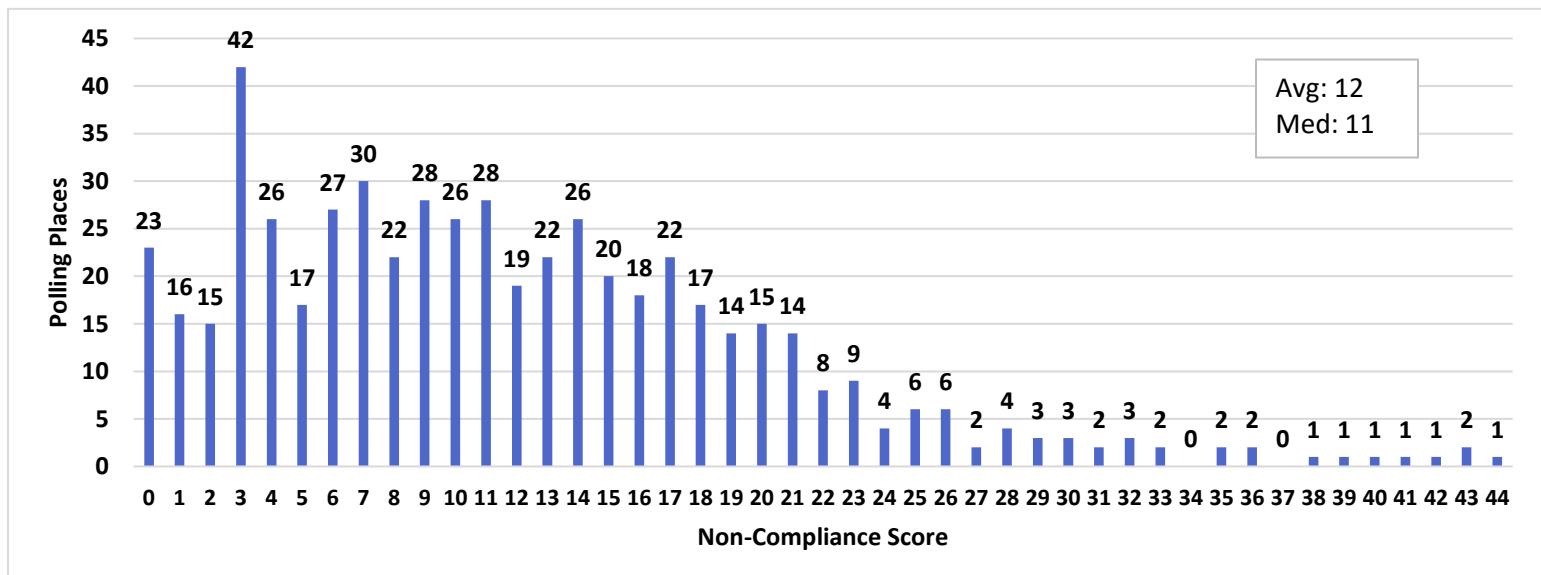
Of the 3,062 total non-compliant findings, 29% (896) were low severity, 27% (668) were medium severity, and 44% (1095) were high severity. The distribution of findings across the three severity ratings matches the distribution of questions across the severity ratings almost exactly, so no one severity rating has significantly more or less findings than another.

Figure 3: Severity of Questions Asked in Review Survey vs. Severity of Non-Compliant Findings by Severity at Polling Places Reviewed 2022-2023



A polling place's non-compliance score is calculated by multiplying each non-compliant finding at a polling place by its severity. Non-compliant findings with a low severity are multiplied by one, medium severity are multiplied by two, and high severity are multiplied by three. The sum of these products is the polling place's non-compliance score. Lower scores are more compliant, and higher scores are less compliant. The average non-compliance score for polling places reviewed in 2022-2023 was 9.36 and the median was 8. A list of the polling places with a non-compliance score of three or lower can be found in Appendix B.

Figure 4: Frequency of Non-Compliance Scores for Polling Places Reviewed 2022-2023



Ten Most Common Findings

The most common non-compliant findings are similar to those in previous election cycles. The ten most common findings from 2022-2023 are shown in Figure 1. A complete list of all findings sorted by frequency can be found in Appendix A. Insufficient signage for van accessible parking spaces and accessible entrances have been some of the most common findings for over a decade. The most common non-compliant finding was for the accessible entrance to be lacking a sign. A sign is required even when the accessible entrance is the only entrance to a building, as was the case at many of the polling places with this finding. The second most common non-compliant finding involved the off-street parking area and can occur for several reasons. There are four elements that make a parking space van accessible: a width of eight feet, a marked access aisle with a width of eight feet, a sign indicating it is van accessible, and eight feet and two inches of vertical clearance. If any of these elements are missing, the parking space is not considered van accessible and will not count towards the number of van accessible parking spaces required for the total number of parking spaces in the lot.

Table 1: Ten Most Common Non-Compliant Findings at Polling Places Reviewed 2022-2023

Rank	Finding	Severity	Count
1.	The accessible entrance was not clearly marked at the door.	High	266
2.	The off-street parking area did not have enough van-accessible spaces and accessible spaces for the number of total parking spaces.	Medium	224
3.	The accessible parking sign in the off-street parking area was not posted high enough.	Low	222
4.	Required election notices and instructions were not posted in at least 18-point size font.	High	169
5.	The accessible entrance door required more than 8 pounds of force to open.	High	108
6.	The accessible voting equipment was positioned in a way that, if a person was seated or standing at the machine, others might see how the voter was marking his/her ballot.	High	100
7.	The accessible pathway (including any grating surface) had breaks, cracks or edges where the difference in height was over 1/2".	Medium	87
8.	The Type D Polling Place Hours and Location Notice was not posted.	Low	87
9.	The accessible booth or table in the voting area was not set up to ensure voter privacy. It was positioned in a way that other voters or visitors to the polling place could see how a voter at the table was marking their ballot.	High	83
10.	The accessible parking spaces in the parking area were not on level, firm, stable and slip-resistant ground.	Medium	80

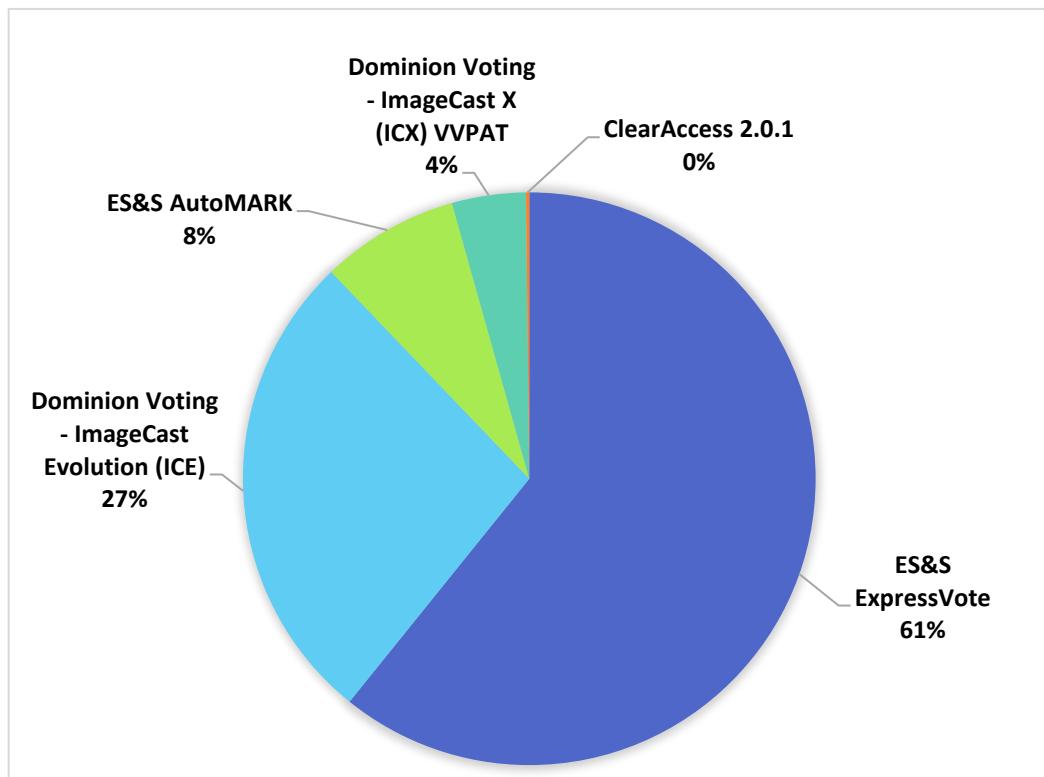
The sixth most common non-compliant finding is related to a lack of privacy at the polls with accessible voting equipment. The WEC has received numerous concerns about the use of

accessible voting equipment being compliant with federal and state law from both voters and advocacy groups including members of the AAC. There were six models of accessible voting equipment in use during the 2022-2023 election cycle. Only five of those models were present at the polling places reviewed: ClearAccess 2.0.1, Dominion Voting – ImageCast Evolution (ICE), Dominion Voting – ImageCastX (ICX), ES&S AutoMARK, and ES&S ExpressVote.

Table 2: Models of Accessible Voting Equipment Used at Polling Places Reviewed 2022-2023

Accessible Voting Equipment Type	Total Reviewed
ES&S ExpressVote	335
Dominion Voting - ImageCast Evolution (ICE)	149
ES&S AutoMARK	43
Dominion Voting - ImageCast X (ICX) VVPAT	23
ClearAccess 2.0.1	1

Figure 5: Models of Accessible Voting Equipment Used at Polling Places Reviewed 2022-2023



The review survey asks five questions about accessible voting equipment, not including questions related to the dimensions of the table or stand the equipment rests on. Wis. Stat. 5.25(4)(a) requires that each polling place have accessible voting equipment available for voters to use while polls are open. It also must provide the same degree of independence and privacy that is afforded to all other voters in the polling place. The review survey asks five questions to assess compliance with those standards:

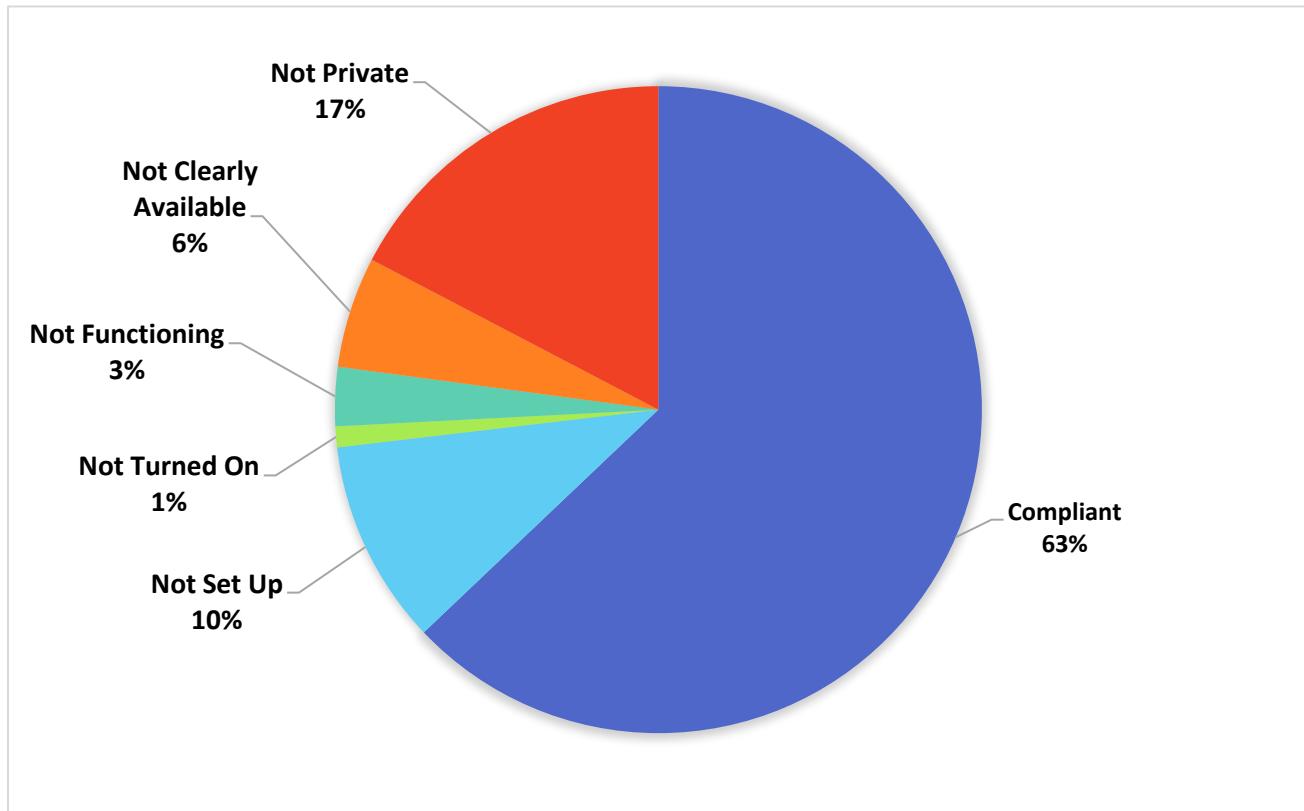
1. Is the accessible voting equipment set up at the time of the review (high severity)?
2. Is the accessible voting equipment powered on at the time of the review (high severity)?
3. Is the accessible voting equipment functioning properly at the time of the review (high severity)?
4. Is the accessible voting equipment in a location where voters would see it and know it

- was available when they entered the voting area (medium severity)?
5. Is the accessible voting equipment positioned in a way that, if a person was seated or standing at the machine, others would not see how the voter was marking their ballot (high severity)?

Table 3: Non-Compliant Accessible Voting Equipment Findings by Model 2022-2023

Accessible Voting Equipment Type	Not Set Up	Not Turned On	Not Functioning	Not Available to Voters	Not Private
ES&S ExpressVote	24	2	17	23	71
Dominion Voting - ImageCast Evolution (ICE)	31	4	0	7	21
ES&S AutoMARK	3	0	0	2	8
Dominion Voting - ImageCast X (ICX) VVPAT	1	0	0	0	2
ClearAccess 2.0.1	0	0	0	0	0

Figure 6: Accessible Voting Equipment Non-Compliant Findings at Polling Places Reviewed 2022-2023

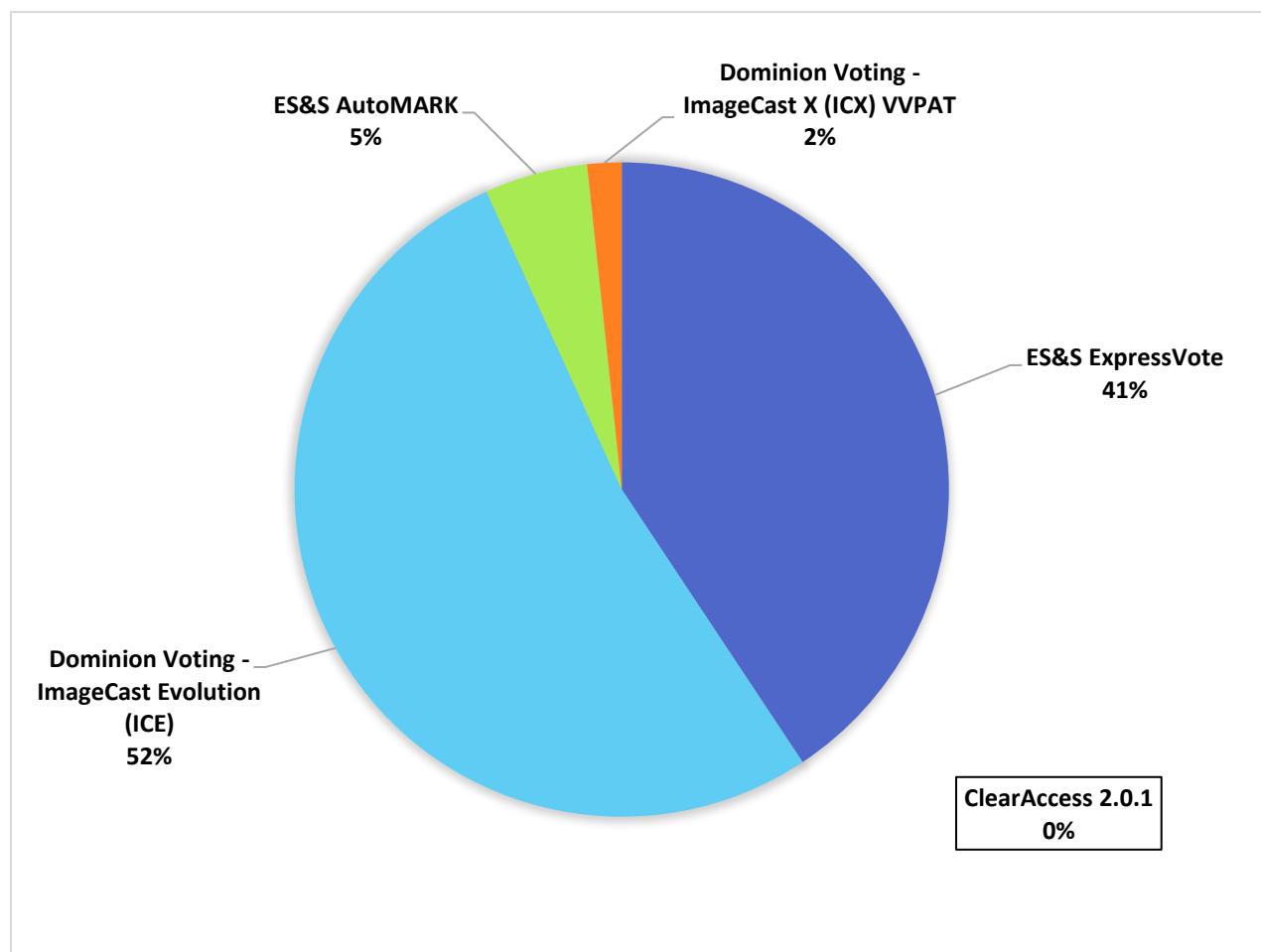


63% of the polling places visited in 2022-2023 had accessible voting equipment set up in compliance with standards in federal and state law. The most common type of non-compliance is a lack of privacy followed by the accessible voting equipment not being set up. There is some variation in compliance between models of accessible voting equipment.

For proper setup of accessible voting equipment, the headphones and tactile keypad should be plugged in and resting on the table in front of the machine so a voter can use the equipment without requiring assistance from an election inspector. This aids in providing equal independence to voters using accessible voting equipment as is required by law. If accessible voting equipment is not set up, the reviewer is not prompted to answer the remaining questions in the section.

Dual purpose voting equipment that is a tabulator and accessible voting equipment, like the ICE, cannot be set up and ready to use without assistance from an election inspector. Reviewers are trained to ask an election inspector how they would accommodate a voter who asks to use the ICE for an accessible voting session. If the election inspector can explain the polling place's procedure, it is considered set up, turned on, and functioning. If the election inspector cannot explain the polling place's procedure or is unaware that the ICE can also function as accessible voting equipment, it is considered not set up and the reviewer is not prompted to answer the rest of the accessible voting equipment questions. While only 27% of the accessible voting equipment reviewed were the ICE, it accounted for 52% of the accessible voting equipment that was not set up.

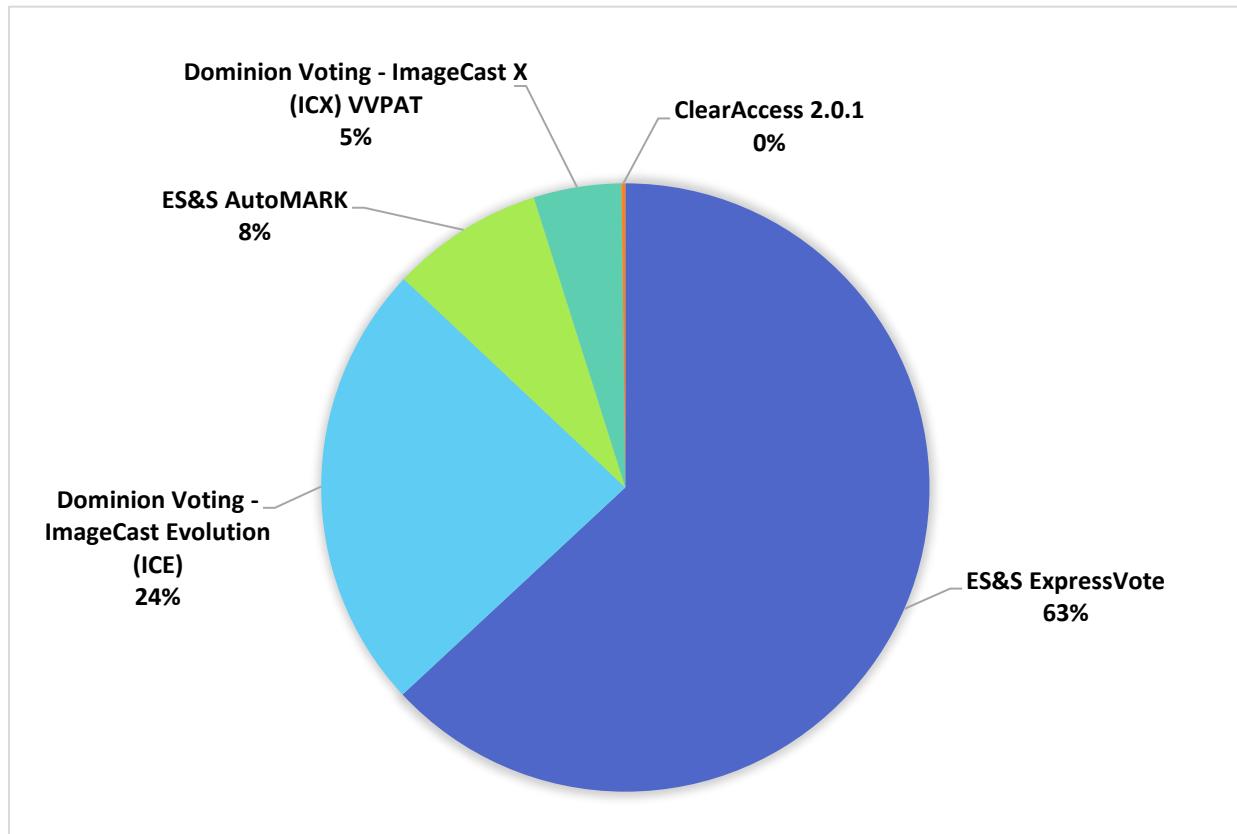
Figure 7: Rate of Accessible Voting Equipment Not Set Up at Polling Places Reviewed 2022-2023 by Model



The remaining questions are only asked for the accessible voting equipment that was set up. See Figure 6. Only six out of the 551 pieces of accessible voting equipment that were reviewed were set up but not turned on, and only 17 were set up and turned on but not functioning properly.

To determine if equipment is not functioning properly, reviewers are trained to look for error messages on the screen. If there are none, the equipment is determined to be functioning properly. Reviewers are instructed to ask the chief inspector to set up and turn on equipment if it is not at the time of the review. If the accessible voting equipment is not set up, turned on, or functioning properly at the time of the review, reviewers are instructed to immediately report the status of the equipment to the WEC Accessibility Specialist who will work with the municipality to correct the problem as quickly as possible.

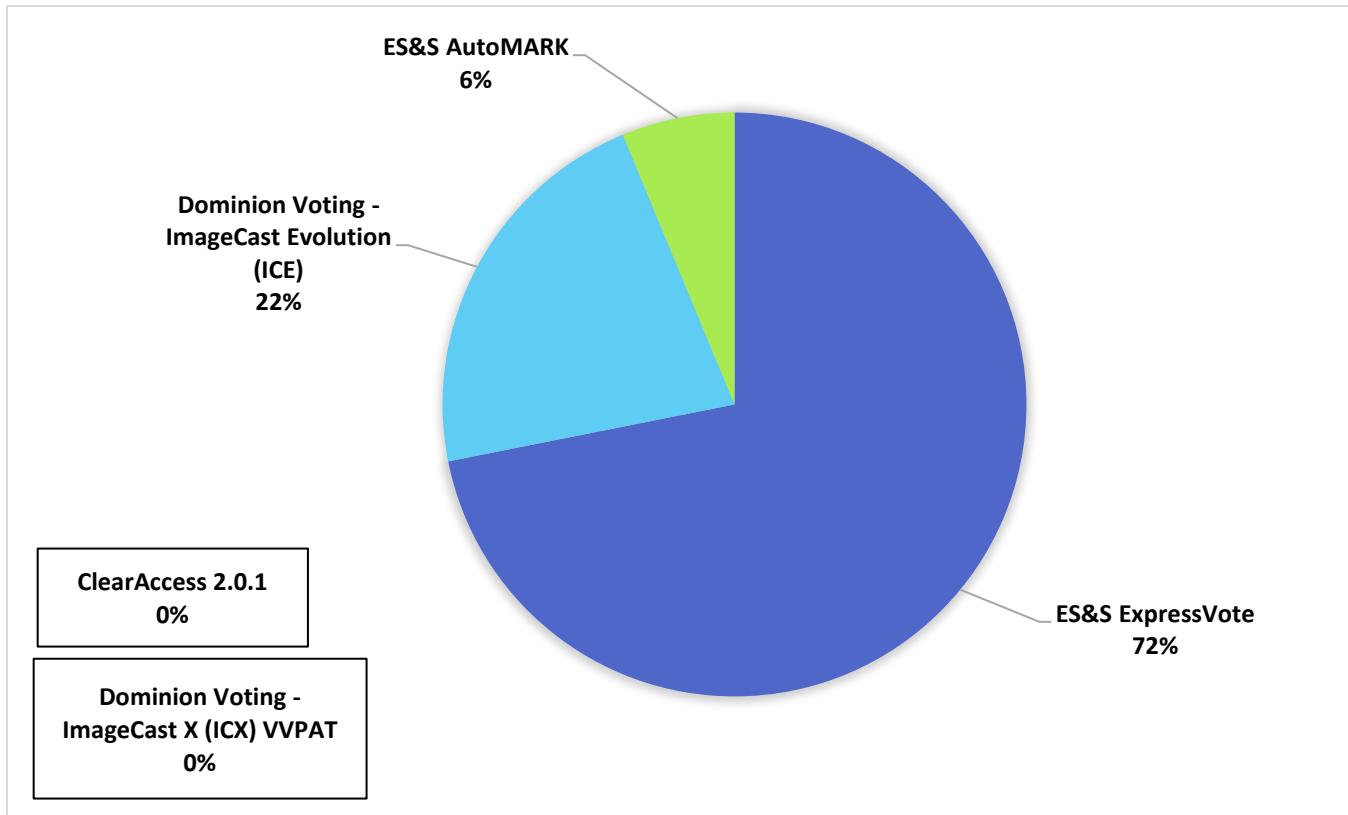
Figure 8: Models of Accessible Voting Equipment Set Up at the Time of the Review 2022-2023



To determine if the accessible voting equipment is set up so voters would see it and know it is available to use, reviewers look for the equipment to be in the voting area with the voting booths and not hidden around corners or behind obstacles. Many voters are not familiar enough with accessible voting equipment to be able to identify it in their polling place. Dual function equipment like the ICE can make identification of accessible voting equipment more difficult.

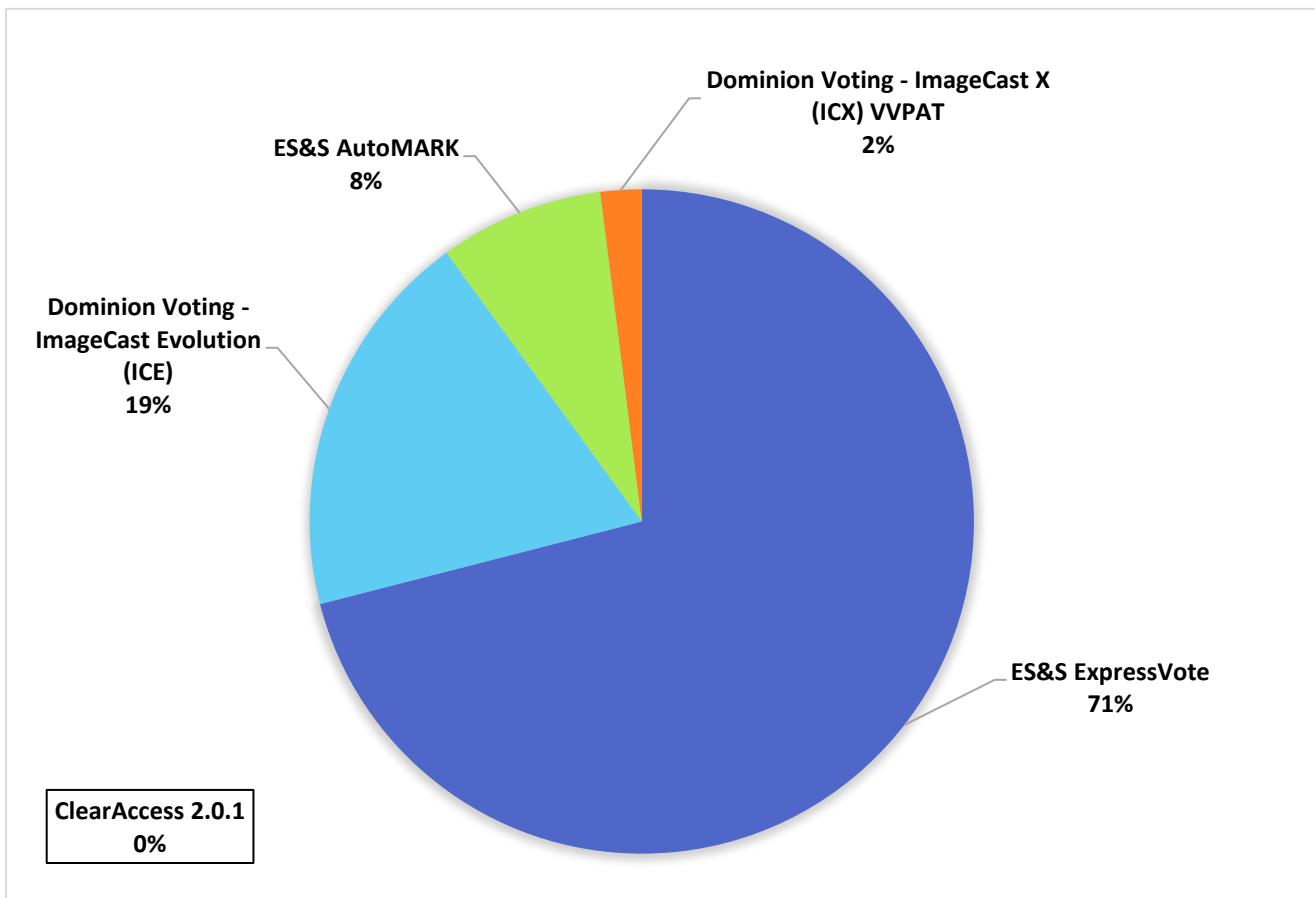
HAVA 301(a)(3)(A) specifies that accessible voting equipment must be accessible to blind and visually impaired voters because they must be afforded the same opportunity for access and participation as sighted voters. Since there are voters who may not be able to see the voting area or recognize voting equipment, the most effective method to meet the clearly available standard is for election inspectors to offer accessible voting equipment to each voter. This may not be able to be assessed if there are no voters at the polling place during the review.

Figure 9: Models of Accessible Voting Equipment That Were Not Clearly Available at the Review 2022-2023



Ensuring privacy with accessible voting equipment is more complex than at a standard voting booth. A privacy shield alone is unlikely to provide sufficient privacy. When a voter is standing in a voting booth, their body is blocking the view of their ballot from passersby. When a voter is seated either marking a paper ballot or using accessible voting equipment, someone standing or walking behind them can see the ballot over the voter's shoulder. If the accessible voting equipment is positioned so the voter is facing a wall with their back to the center of the room, which is how standard voting booths are often positioned, it is unlikely that voter is being provided the same level of privacy as other voters in that polling place. The audio tactile interface (ATI) of accessible voting equipment reads the ballot to the voter and provides audio cues for the voter to navigate and mark their ballot. This is why headphones, and the tactile keypad are a necessary part of set up. Voters using the ATI may adjust the volume to their needs. Other people in the polling place should not be so close that they can hear how a voter is marking their ballot.

Figure 10: Models of Accessible Voting Equipment Lacking Privacy at their Review 2022-2023



Additionally, when a polling place uses dual purpose equipment like the ICE and does not have an auxiliary screen to allow tabulation and accessible voting sessions to be run simultaneously, providing equal privacy can be a challenge. When a piece of equipment is functioning as a tabulator, it must be positioned so voters can deposit their ballots and keep the flow of traffic moving. For this reason, it is often positioned near the exit and not near the voting booths.

Typically, the screen of the tabulator faces into the room so voters can see it when they deposit their ballot. For an accessible voting session, the ICE should be repositioned so the screen faces a wall or corner, and no one can be behind the voter while they are marking their ballot.

Reviewers are trained to ask an election inspector what the procedure is for maintaining privacy for a voter using the ICE. If the election inspector can explain the polling place's procedure for providing a voter privacy, it is considered private. If the election inspector cannot explain the polling place's procedure, the accessible voting equipment is considered not private. It is important to note that if an election inspector was unable or unaware of the polling place's procedure for providing accessible voting sessions, the reviewer was not prompted to answer the remaining questions including the question about privacy.

Without an auxiliary screen for accessible voting sessions, an election inspector must pause tabulation and begin an accessible voting session for the voter. The ICE has a locked compartment on its side where other voters can deposit their ballots during this time. Marking a ballot using the ICE can take longer than marking a ballot by hand, especially if a voter is using the audio tactile interface and having the ballot read to them. Once the voter has completed their accessible voting session, election inspectors return the ICE to its tabulating function and

deposit the ballots from the locked compartment. Some voters may prefer to wait until the accessible voting session is finished so they can insert their own ballot into the tabulator. This can stop the flow of traffic and create a line of people waiting near the voter using the accessible voting equipment. Each polling place should have a plan in place to redirect voters to wait away from the voter completing an accessible voting session.

Conclusion

Reviewing 551 different polling places throughout the state provided the WEC with data on current accessibility issues in polling places which can be used to identify common concerns. WEC staff provides clerks with a report for each of their polling places reviewed. Then, clerks complete a Plan of Action by choosing a recommendation provided by staff or by working with staff to come up with a unique solution for their problems. Some of the non-compliant findings can be rectified using free supplies from the Accessibility Supply Program. This includes solutions to the two most common non-compliant findings. The Supply Program offers accessible entrance signs, accessible parking signs, van-accessible signs, curbside voting signs, wireless doorbells, and orange cones among other items. Staff reviews and approves plans, and clerks certify they will follow through with their Plan of Action. WEC staff also plans to continue to train accessibility best practices with clerks and their election inspectors to make sure a voter's polling place is as accessible as possible. WEC staff will continue to work with partners on the Accessibility Advisory Committee as well as reviewers after the 2023 spring elections to further improve the polling place review program with updated questions to better capture voters' experiences in polling places.

Accessibility Advisory Committee

Through 2022 and 2023 WEC staff continued to work closely with members of the agency's Accessibility Advisory Committee (AAC) and their organizations. A complete list of members and their organizations can be found in Appendix C. The AAC meets quarterly at open meetings hosted virtually on Zoom. Committee members discuss the actions of the agency's accessibility program, relevant litigation, complaints, and other timely topics.

WEC staff worked with AAC members on training and outreach to local election officials about polling place accessibility. Various Committee members were panelists on two live webinars in 2022. In live webinars clerks are able to ask questions and receive answers from experts in the field of disability and voter rights. One of the webinars was about accessible polling place setup and the other was on accessible voting equipment which was paired with additional resources for local election officials. Both webinars can be found on the agency's [Vimeo showcase for Election Accessibility](#) along with previous videos made with the Disability Vote Coalition.

Committee members have focused on improving the use of accessible voting equipment. Every polling place in the state has had a piece of accessible voting equipment since 2006 as required under the Help America Vote Act (HAVA). When used appropriately, accessible voting equipment provides voters with disabilities the same grade of privacy and independence as

voters without disabilities. Different models of accessible voting equipment and how they are set up and positioned in a voting area can make compliance vary between polling places.

Committee members' most significant concerns regarding accessible voting equipment are related to dual function voting equipment, that is both a tabulator and a piece of accessible voting equipment. Without an auxiliary screen for a voter to complete accessible voting sessions concurrently with other voters depositing their ballots, an election inspector must pause tabulation while the voter uses the accessible features to mark their ballot. Committee members have expressed concern about the vulnerable position this puts voters with disabilities in as some voters choose to remain in the polling place until the accessible voting session is done to insert their ballot into the tabulator themselves rather than depositing their ballot into the locked compartment on the machine which is the standard procedure for this situation.

Committee members have raised concerns about the accessibility of absentee voting as well. Voters with blindness or low vision still do not have an accessible absentee ballot or certificate envelope that can be marked independently. Additionally, Committee members have seen a rise in voter confusion regarding absentee ballot return and assistance due to the multiple court decisions on the issue.

WEC staff worked closely with members of the AAC to recruit more people to perform polling place accessibility reviews. No reviews occurred between the Spring Primary in February of 2020 and the Spring Primary in February of 2022 due to the COVID-19 pandemic. The agency's long-time partner Disability Rights Wisconsin continues to provide professionals from the disability rights and advocacy field to conduct reviews with the WEC. In 2022, the WEC was able to work with the Wisconsin Coalition of Independent Living Centers for the first time to assist with polling place accessibility reviews. There are eight Independent Living Centers across the state each with assessors trained in Title II of the Americans with Disabilities Act (ADA). These assessors have more professional experience in ADA compliance than other reviewers the agency has worked with in the past. Their attention to detail and commitment to accuracy has improved the quality of data WEC staff receives from these reviews and saves WEC staff hours of organizing data.

WEC staff remains involved in the disability voting rights and advocacy community at large through invitations to present at and attend various events. WEC staff was invited to present at the National Federation of the Blind of Wisconsin's Conference in 2022 and 2023 by the President who serves on the AAC. The staff's presentations included important election cycle dates and deadlines as well as information about accessible voting equipment and certification of new systems. The main concerns voiced by this group included the loss of screen reader friendly absentee ballots following the One Wisconsin decision in the summer of 2020 and the availability of accessible voting equipment at their polling places. Following this event, when presenting at clerk training, WEC staff emphasize the need for poll workers to offer accessible voting equipment to every voter.

WEC staff virtually attended the Self-Determination Conference hosted by the Wisconsin Board for People with Developmental Disabilities. WEC staff was particularly interested in presentations on accessible technology and transportation as both access to appropriate technology and transportation are often cited by voters with disabilities as barriers to voting.

WEC staff was invited by Disability Rights Wisconsin to collaborate on a presentation at the Department of Health Services' FOCUS Conference on the topic of voting in residential care facilities and retirement homes served by Special Voting Deputies.

Supply Program

The data gathered by the review program has provided a baseline for polling place accessibility in Wisconsin. This information has been used to identify common problems with polling place set-up and accessible voting equipment and general problems with municipal and private facilities where polling places are located. Review of this data allowed WEC staff to adjust the existing training protocol and develop additional training resources. As detailed earlier in this report, specific problems identified during polling place reviews are also reported to municipalities to improve compliance. In addition to providing this guidance, the WEC has purchased and distributed accessibility-related supplies to assist local elections and municipal officials with completing the necessary polling place changes. Supply orders are generally expected to correspond with findings from either a self-reported or WEC-conducted review, but municipalities can request any supplies that improve accessibility if they designate a need for the supplies with their request.

In the 2022-2023 reporting period, 154 orders were placed by 140 municipalities. The most popular supplies are the orange cone, page magnifier, curbside voting sign with space to write a phone number, wireless doorbell, and accessible entrance sign. With the exception of the page magnifier and curbside voting sign, these supplies can be used to address some of the most common non-compliant findings. The accessible entrance window decal solves the problem of unmarked accessible entrances. Orange cones can be used to mark temporary accessible parking spaces and access aisles, and a wireless doorbell can be used to alert election inspectors that a voter needs assistance entering the polling place because the door is too heavy.

Clerk Support

Wisconsin law requires one certified chief inspector to be present in every polling place on Election Day while the polls are open and mandates that all municipal clerks attend a state-sponsored training program at least once every two years. The Wisconsin Elections Commission, pursuant to Wis. Stats. §§ 7.31 and 7.315, developed curriculum for the training and certification of chief inspectors and municipal clerks.

In 2022 the WEC collaborated with members of the Accessibility Advisory Committee (AAC) to present two live webinars to clerks and local election officials. Live webinars are hosted over Zoom and provide attendants an opportunity to ask questions to WEC staff and guest panelists. The first webinar covered accessible polling place set-up and was presented by WEC staff and three members of the AAC. While polls are open a polling place must be compliant with the Americans with Disabilities Act (ADA). The second webinar covered best practices concerning accessible voting equipment and two members of the AAC and a local election official. The webinar reviewed how clerks could ensure the accessible voting equipment in their polling places met standards for privacy and independence set in both the Help America Vote Act (HAVA) and state statute. Since running a polling place on Election Day is the responsibility of

the Chief Inspector and not the clerk, WEC staff created fact sheets that cover basic best practices for accessible voting equipment to be used by election inspectors. Webinars and associated materials can be found on the [Polling Place Accessibility page](#) of the WEC's website.

Accessibility Concern Form

In 2021, the Accessibility Advisory Committee recommended having an informal way for individuals to report accessibility-related concerns, such as a form on the website. In response to this suggestion, the WEC created a concern form focused on accessible voting issues and added it to the agency website. This form allows for a structured process for individuals to report incidents to the WEC and have them resolved or followed-up with quickly. On the concern form, the voter must select from a drop-down menu that includes polling place accessibility, curbside voting, voting equipment, website accessibility, and other. Each category has various issues that a voter can select, and if they choose, enter their contact information for staff to follow up. Below is a summary of the concerns that the WEC received in 2022.

- Questions or issues returning an absentee ballot (9)
- Parking/curbside voting issues (4)
- Training issues with poll workers (2)
- Lack of signage (2)
- Privacy (1)
- Photo ID (1)

Please note that this list does not include unrelated concerns that were submitted using the concern form, including concerns about the USPS, and receiving an absentee ballot on time, concerns for the amount of poll workers hired for an election, and questions about voting equipment jams. Those issues were addressed by WEC staff with voters but are not included in this data above.

Voters still have the option to file a sworn complaint, and it is often suggested especially for voters who want formal outcomes or who have an issue that cannot be resolved quickly.

Best Practices from Around the State

Clerks across the State of Wisconsin worked tirelessly to assist voters with disabilities and brainstorm creative solutions to problems. This list is just a few examples and is in no way comprehensive and can never represent all the work that clerks do daily to make voting accessible.

The **Town of Montello** and the **City of Eau Claire** appointed chief inspectors who were voters with disabilities themselves. It is important that election workers are representative of their community, and all of our communities include people with disabilities. Chief inspectors and election inspectors who have first-hand experience navigating public spaces with a disability, are able to quickly and effectively ensure that the polling place is accessible for everyone who uses it.

Milwaukee County and the **City of Madison** continued to offer braille ballots to voters who requested them. This practice is more significant now that regular voters cannot receive their ballot electronically in a format that would allow them to use access technology.

The **Town of Fort Winnebago**, **City of Algoma**, and **City of New Berlin** all had excellent greeters at their polling places. Polling places are not required to have greeters, but greeters do important work to make polling places accessible, like watching for voters who want to vote curbside, helping to open the door, and assisting voters in navigating the interior route and voting area in their polling place.

The **Village of Weston** and **City of Superior** had limited space in their polling places, but with efficient and accessible set up, they kept voters moving through quickly. Efficiency is important to decrease the amount of time voters spend waiting in line, which can be difficult for voters with disabilities. Smaller voting areas can make it more challenging for paths of travel to be wide enough for a wheelchair or to maintain privacy at accessible voting booths, but both of these municipalities put in the extra effort to make the spaces work for the voters.

In the **City of Waunakee** chief inspectors wore aprons that said chief inspector on them. This makes the chief inspectors easy to find for both voters and other election inspectors if they have a question as well as WEC representatives conducting reviews.

In **Shawano County** and the **City of Madison**, election inspectors offered accessible voting equipment to every voter and were able to help voters use it. Offering accessible voting equipment to every voter helps voters who frequently use the equipment and voters who want to try to use the equipment to mark their ballot. It is important that election inspectors are also able to help voters learn how to use the equipment.

Conclusion

This report identifies the need for continued improvement for accessible voting in Wisconsin for elderly voters and voters with disabilities, but also outlines the work that was done in this reporting period to ensure that all voters had the ability to exercise their right to a private and independent ballot. The Wisconsin Elections Commission remains committed to visiting every polling place in the state to assess compliance with laws designed to ensure that all voters can enter their voting location on Election Day and cast a private and independent ballot. WEC staff and representatives have visited the vast majority of municipalities in Wisconsin over the last 14 years and continue to create plans to review new and unvisited polling places.

The agency's polling place accessibility review program has been successful in identifying common accessibility problems, reporting those issues to local election officials, and working with local election officials to rectify those problems. The decrease in the average number of audit findings indicates an improvement in the accessibility of polling places.

Advocacy groups representing elderly voters and voters with disabilities were essential to decreasing barriers that voters face in Wisconsin. Going beyond physical accessibility, it is important for polling places to be accessible in every way to voters with disabilities. Creating an

easy-to-use accessibility concern form allows for better tracking and ensures that WEC can tailor its training to be impactful in reducing barriers to participation. Additionally, the updated Election Day Accessibility Checklist allows clerks and poll workers to assess their polling place, including their interactions with voters, to make improvements in how the polling place is organized and how election inspectors interact with voters.

Despite the high turnover of Wisconsin election officials, it is promising that site review data was relatively consistent throughout 2011-2020. This report suggests that the data does not fully capture the experience of elderly voters and voters with disabilities. Training efforts and materials may have led to increased clerk awareness of accessibility practices, and it is possible that future accessibility reviews will reflect that these efforts have improved the accessibility of polling places for individuals with disabilities. Commission staff will continue to conduct reviews and provide supplies to clerks to increase access to the polls for all eligible voters. The Accessibility Advisory Committee will continue to meet so that advocacy groups can share their experience and expertise with Commission staff. All the information gained through these endeavors will be used to create a well-rounded training protocol for local election officials and poll workers whose aim is to ensure that all eligible voters can cast a ballot without barriers that discourage participation.

Appendix A: Non-Compliant Findings at Polling Places Reviewed 2022 – 2023 Sorted by Frequency

Rank	Finding	Severity	Count
1	The accessible entrance was not clearly marked at the door.	3	266
2	The off-street parking area did not have enough van-accessible spaces and accessible spaces for the number of total parking spaces.	2	224
3	The accessible parking sign in the off-street parking area was not posted high enough.	1	222
4	Required election notices and instructions were not posted in at least 18-point size font.	3	169
5	The accessible entrance door required more than 8 pounds of force to open.	3	108
6	The accessible voting equipment was positioned in a way that, if a person was seated or standing at the machine, others might see how the voter was marking his/her ballot.	3	100
7	The accessible pathway (including any grating surface) had breaks, cracks or edges where the difference in height was over 1/2".	2	87
8	The Type D Polling Place Hours and Location Notice was not posted.	1	87
9	The accessible booth or table in the voting area was not set up to ensure voter privacy. It was positioned in a way that other voters or visitors to the polling place could see how a voter at the table was marking their ballot.	3	83
10	The accessible parking spaces in the parking area were not on level, firm, stable and slip-resistant ground.	2	80
11	Ward maps or street directories were not posted or prominently displayed.	1	65
12	The accessible spaces in off-street parking area were not marked with clearly visible parking signs with the proper symbol of accessibility.	1	63
13	At the time of the accessibility audit, the accessible voting equipment was not set up.	3	59
14	The off-street accessible parking spaces were not located nearest to the accessible entrance.	2	57
15	The accessible pathway had a slope greater than 5%.	2	55

16	There were not two samples of each ballot type posted.	1	54
17	The General Information on Voting Rights Under Federal Laws (EL-117) was not posted.	1	54
18	The Contact Information (EL-118) was not posted.	1	54
19	The accessible pathway was not on level, firm, stable and slip-resistant ground.	2	51
20	The Voter Qualification Poster (EL-115) was not posted.	1	51
21	The interior routes were not clearly marked by large print signs.	2	50
22	The Election Fraud Notice (EL-111) was not posted.	1	49
23	The electronic accessibility feature (automatic opener/power-assisted open/bell/buzzer) on the accessible entrance door was not functioning from the outside and/or inside at the time of the Accessibility Audit.	3	42
24	The interior route to the voting area had obstacles such as tables, chairs, boxes, etc.	3	37
25	The corridors along the accessible route inside the building had obstacles that extended more than 4" from the wall, and were between 27" and 80" above the floor. Drinking fountains, fire extinguishers, and/or mounted display cases are the most common examples of these obstacles.	3	37
26	The voting area had no booth or table where a voter using a wheelchair may cast a paper ballot privately and independently.	3	37
27	The knee clearance from the floor to the underside of the booth or table in the voting area on which the accessible voting equipment rests was less than 27".	3	37
28	The floor space in front of the table or stand holding the accessible voting equipment in the voting area was less than 30" x 48".	3	37
29	The accessible pathway was not clearly marked by large print signs.	1	36
30	The accessible entrance had door hardware that did not meet Americans with Disabilities Act (ADA) standards.	3	35
31	The accessible voting equipment was not in a location where voters would see it and know it is available when they enter the voting area.	2	32

32	The on-street parking area did not have any marked accessible parking spaces.	1	29
33	The corridors had mats or rugs that were not secured or were folded or buckled.	2	26
34	The Type B Sample Ballot and Voting Instructions Notice was not posted.	1	26
35	The accessible entrance door required more than 8 pounds of force to open.	3	25
36	The toe or knee clearance from the front to the back of the booth or table in the voting area on which the accessible voting equipment rests was less than 19".	3	25
37	The accessible pathway did not have adequate lighting throughout Election Day.	2	24
38	The Type C Notice of Referendum was not posted.	1	23
39	The accessible pathway had hanging objects (flags, tree branches, banners) between 27" and 80" above the ground.	2	22
40	The Notice of Crossover Voting (EL-112/EL-112m) was not posted.	1	21
41	The accessible pathway was not maintained and kept clear of hazards throughout Election Day.	2	20
42	The knee clearance from the floor to the underside of the booth or table in the voting area was less than 27".	3	20
43	The ramp at the accessible entrance did not have a non-slip surface.	1	18
44	The voting area had obstacles that extended more than 4" from the wall, and were between 27" and 80" above the floor. Drinking fountains, fire extinguishers, and/or mounted display cases are the most common examples of these obstacles.	3	17
45	The entrance to the accessible booth or table in the voting area was less than 30" wide.	3	17
46	At the time of the accessibility audit, the accessible voting equipment was not functioning properly.	3	17
47	The height of the top of the booth or table in the voting area on which the accessible voting equipment rests was less than 28" or higher than 34" above the ground.	3	17
48	The accessible parking space in the on-street parking area was not marked with a clearly visible accessible parking	2	15

	sign.		
49	The accessible entrance was locked on Election Day.	3	15
50	The ramp at the accessible entrance had a slope greater than 8%.	2	14
51	The curb cut on the accessible pathway had a slope greater than 8%.	2	13
52	The van-accessible parking space in the off-street parking area did not have 8'2" of unobstructed vertical clearance.	2	13
53	The voting area was set up in a way that did not allow for an obstructed turning radius of 5' x 5' for a voter in a wheelchair.	3	13
54	The entrance to the booth or table in the voting area on which the accessible voting equipment rests was less than 30" wide.	3	13
55	The toe or knee clearance from the front to the back of the accessible booth or table in the voting area was less than 19".	3	12
56	The curb cut or ramp in the off-street parking area had a slope greater than 8%.	2	12
57	The accessible parking sign in the on-street parking area was not posted high enough to be in compliance.	1	11
58	The ramp on the accessible pathway did not have a handrail that was mounted between 34" and 38" above the ramp surface.	2	11
59	The ramp at the accessible entrance did not have edge protection on each side of the ramp.	1	9
60	The height of the top of the accessible booth or table in the voting area was less than 28" or higher than 34" above the ground.	3	9
61	The width of the opening at the accessible entrance door was less than 32".	3	8
62	There was less than 18" of space on the latch-side of the door at the top of the ramp at the accessible entrance.	3	8
63	The corridors along the interior route to the voting area were not properly lit on Election Day.	3	8
64	The path of travel within the voting area was less than 36" wide or narrowed to less than 32" for more than a short	2	8

	distance.		
65	The curb cut or ramp in the on-street parking area had a slope greater than 8%.	2	7
66	The ramp on the accessible pathway had a slope greater than 8%.	2	7
67	The ramp on the accessible pathway did not have a non-slip surface.	1	7
68	The automatic button and/or power assist open feature on the accessible entrance door did not stay open for at least three (3) seconds once it is fully opened.	3	6
69	The corridors along the accessible route inside the building were less than 48" wide or narrowed to less than 36" for more than a short distance.	3	6
70	At the time of the accessibility audit, the accessible voting equipment was not powered on.	3	6
71	The accessible parking spaces in the on-street parking area were not on level, firm, stable and slip-resistant ground.	2	5
72	The controls on the accessible voting equipment in the voting area were higher than 54" when approached from the side or higher than 48" when approached from the front.	3	5
73	The accessible pathway was less than 36" wide or had obstacles that narrowed the pathway to less than 32" for more than a short distance.	2	4
74	The accessible parking spaces in the on-street parking area were not located nearest to the accessible entrance.	2	3
75	The ramp on the accessible pathway did not have a handrail that was mounted between 34" and 38" above the ramp surface.	2	3
76	The ramp on the accessible pathway did not have edge protection on each side of the ramp.	1	3
77	The door handles on the accessible entrance were higher than 48" above the ground.	1	3
78	This polling place had a vestibule at the accessible entrance and there was not a 30"x48" clear floor space between the two sets of entrance doors.	3	3
79	The interior door had a threshold where the difference in height was greater than 1/2".	2	3

80	The interior door along the route to the voting area had an opening that was less than 32" wide.	3	3
81	The door on the interior route had hardware that did not meet Americans with Disabilities Act (ADA) standards.	3	3
82	There was less than a 5'x5' level space in front of the door on top of the ramp on the interior route.	3	3
83	The elevator inside the building did not have audible tones or bells that sound as each floor is passed.	3	3
84	The surface of the drop-off zone had a slope greater than 2%.	2	2
85	The curb cut on the accessible pathway was less than 36" wide.	1	2
86	The ramp at the accessible entrance was less than 36" wide.	1	2
87	The ramp on the interior route had a slope greater than 8%.	2	2
88	The ramp on the interior accessible route did not have edge protection on each side of the ramp.	1	2
89	The ramp in the off-street parking area did not have edge protection on each side of the ramp.	1	2
90	The accessible entrance door had a threshold where the difference in height was greater than 1/2".	3	1
91	The curb cut or ramp in the on-street parking area was less than 36" wide.	1	1
92	The ramp on the accessible pathway was less than 36" wide.	1	1
93	The corridors had rugs or mats or carpets that had pile higher than 1/2".	2	1
94	The electronic accessibility feature (automatic opener/power-assisted open/bell/buzzer) on the interior door along the accessible route was not functioning from the outside and/or inside on Election Day	3	1
95	The interior door required more than 5 pounds of force to open.	3	1
96	The elevator at this polling place was not functional on Election Day.	3	1
97	The controls inside the elevator cab were installed at a non-compliant height.	3	1
98	The elevator controls inside the cab inside the building were	3	1

	not marked with raised lettering or Braille.		
99	The ramp in the off-street parking area did not have a non-slip surface.	1	1
100	The access aisle in the drop-off zone was less than 5' wide or 20' long.	1	0

Appendix B: Polling Places with a Non-Compliance Score of Two or Lower

Polling Places with a Non-Compliance Score of 0:

Polling Place Name	Municipality	County
Tripp Town Complex	Town Of Tripp	Bayfield County
Brillion Community Center	City Of Brillion	Calumet County
Leeds Town Hall	Town Of Leeds	Columbia County
Lodi Town Hall	Town Of Lodi	Columbia County
City of Madison Fire Station 14	City of Madison	Dane County
Nekoosa Trail Fleet Facility	City of Madison	Dane County
Nasewaupee Fire Station	Town Of Nasewaupee	Door County
Oakland Town Hall	Town of Oakland	Douglas County
Florence Community Center	Town Of Florence	Florence County
Merrillan Village Hall	Village of Merrillan	Jackson County
Kenosha Public Museum	City Of Kenosha	Kenosha County
Kewaunee City Hall	City Of Kewaunee	Kewaunee County
Gratiot Firehouse	Town Of Darlington	Lafayette County
Antigo Town Hall	Town Of Antigo	Langlade County
Marathon Park East Gate 2	City of Wausau	Marathon County
Rothschild Pavilion	Village of Rothschild	Marathon County
Community Rec Center	City Of Marinette	Marinette County
Grant Town Hall	Town Of Grant	Portage County
Lanark Town Hall	Town Of Lanark	Portage County
Rock County Daniel H Williams Resource Center	City Of Janesville	Rock County
E&R UCC Church	City Of Waukesha	Waukesha County
Waukesha Fire Station No. 5	City Of Waukesha	Waukesha County
Waukesha Park Rec Building	City Of Waukesha	Waukesha County

Polling Places with a Non-Compliance Score of 1:

Polling Place Name	Municipality	County
Stanley Town Hall	Town Of Stanley	Barron County
Town Of Bell Community Center	Town Of Bell	Bayfield County
East Madison Community Center	City of Madison	Dane County
Eastside Lutheran	City of Madison	Dane County
Burke Town Hall	Town of Burke	Dane County
Brussels Community Center	Town Of Brussels	Door County
Clay Banks Town Hall	Town Of Clay Banks	Door County
Government Center	City of Superior	Douglas County
Highland Village Hall	Village Of Highland	Iowa County
Somers Village/Town Hall	Village Of Somers	Kenosha County
Merrill Town Hall	Town of Merrill	Lincoln County
Matsche Community Center	Village Of Birnamwood	Marathon County
Cicero Town Hall	Town Of Cicero	Outagamie County
Buena Vista Town Hall	Town Of Buena Vista	Portage County

Amherst Junction Village Hall	Village Of Amherst Junction	Portage County
Spring Green Community Library	Village Of Spring Green	Sauk County

Polling Places with a Non-Compliance Score of 2:

Polling Place Name	Municipality	County
Lodi City Hall	City Of Lodi	Columbia County
Fountain Prairie Town Hall	Town Of Courtland	Columbia County
Roxbury Town Hall	Town Of Roxbury	Dane County
Vienna Town Hall	Town Of Vienna	Dane County
Blue River Community Building	Village Of Blue River	Grant County
Belleville Village Hall	Village Of Belleville	Green County
KUSD Educational Support Center	City Of Kenosha	Kenosha County
Algoma City Hall	City Of Algoma	Kewaunee County
Wiota Town Hall	Town Of Wiota	Lafayette County
Lincoln County Service Center	City of Merrill	Lincoln County
Easton Municipal Center	Town Of Easton	Marathon County
Allen-Field Elementary School	City of Milwaukee	Milwaukee County
Bradley Tech High School	City of Milwaukee	Milwaukee County
Shiocton Village Hall	Village Of Shiocton	Outagamie County
St. William Campus	City Of Waukesha	Waukesha County

Appendix C: Members of the WEC Accessibility Advisory Committee

Name	Title	Organization
Barbara Beckert	Director of External Advocacy	Disability Rights Wisconsin
Ben Dallin	President	National Federation of the Blind of Wisconsin
Denise Jess	Executive Director	Wisconsin Council of the Blind and Visually Impaired
Janet Zander	Advocacy and Public Policy Coordinator	Greater Wisconsin Agency on Aging Resources
Jason Endres	Chair	Independent Living Council of Wisconsin
Jason Glazier	Executive Director	Wisconsin Coalition of Independent Living Centers
Jenny Neugart	Disability Grassroots Organizer	Wisconsin Board for People with Developmental Disabilities
Kyle Kleist	Executive Director	Center for Independent Living for Western Wisconsin
Lisa Demmon	Board Vice President	Wisconsin Association of the Deaf
Nikyra McCann	Board Member	National Alliance for the Mentally Ill of Dane County
Nino Amato	Honorary Board Chair	Coalition of Wisconsin Aging & Health Groups
Rebecca Hoyt	Disability Rights and Services Specialist	City of Madison, Civil Rights Division
Tonya Whittfield	Voting Outreach Specialist	Disability Rights Wisconsin