



## **The Sunshine Week 2007 National Information Audit: Comprehensive Emergency Response Plans**

*A project of the American Society of Newspaper Editors-Sunshine Week, the Coalition of Journalists for Open Government, the National Freedom of Information Coalition and the Society of Environmental Journalists*

---

Twenty years ago, in the wake of the world's greatest chemical plant catastrophe in Bhopal, India, Congress passed a law requiring every community to develop, update and make public plans for action in cases of chemical or hazardous materials spills.

Congress made its intention clear in naming the law the Emergency Planning and Community Right-to-Know Act. And it didn't just say the public had a right to see the plan; it directed each planning committee to annually notify the public that the plan had been updated and was available.

Yet when hundreds of reporters, student journalists and League of Women Voters members nationwide asked recently to see these Comprehensive Emergency Response Plans (CERPs) for their communities, local officials and other custodians of the plans said "no" more than one-third of the time, and two in five provided only partial reports.

In some cases, officials ran background checks on citizen auditors or sent police to follow them. The highway patrol in one state even launched an 88-county alert seeking more information about one requester.

Officials who denied requests frequently cited national security or terrorism concerns, despite the fact that the 1986 law provides for withholding sensitive information in what's called a Tier II report.

Some agencies clearly understood the law and its intent, however. Forty-four percent released the full report. Some of those had posted the information online; others provided the information on disc. And one official in Iowa said

he was delighted to see a citizen seeking the report: "We need more awareness on what to do during an incident for the safety of everyone."

There were wide variations in the fee quoted or charged for the report, with 90 percent of agencies releasing the plan at no cost. But Maryland's Caroline County Attorney Ernest A. Crofoot informed Ted Bond of the Queen Anne's County Record-ObsERVER, after a two-week delay in responding to the public record request, that the report would cost \$1,714.

In a Feb. 1 letter to Bond, Crofoot detailed the cost: "At a copying cost per page of \$0.25, the copying costs would be \$114.00. I estimate that it will take me at least 6 to 8 hours to review the document for non-disclosure compliance with the Act. The cost to the County for that review time would be in the range of \$1,200 to \$1,600. Thus, to assess properly your request, the total cost range would be approximately \$1,300 to \$1,700." Crofoot said the county would need \$1,200 up front, which Bond did not pay, and he did not receive the plan. The attorney's letter effectively discouraged Bond, as it would almost any citizen. He didn't buy the public report.

The public emergency response plan must identify facilities and transportation routes of hazardous substances, describe emergency procedures, outline notification procedures, describe areas potentially affected, outline evacuation plans, list available resources and designate emergency response coordinators.

Among the LEPCs audited in six designated regions, denials were most frequent in New England (Connecticut, Massachusetts, New Hampshire and Rhode Island) and the Mid-Atlantic (Maryland, New Jersey, New York, Pennsylvania), 46 percent in each region. Fewer than one-fourth of requests made in the South (Alabama, Arkansas, Florida, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee and Virginia) were unsuccessful.

The audit was sponsored by the American Society of Newspaper Editors-Sunshine Week, the Coalition of Journalists for Open Government, the National Freedom of Information Coalition and the Society of Environmental Journalists.

The following report is a snapshot of auditors' experiences in requesting public information. The audit sampled 375 of the more than 3,000 LEPCs across the country, or about 12 percent. Requests were made in 36 states and one U.S. territory.

The audit was conducted Jan. 8-12 and Jan. 15-19 by volunteers from local newspapers and broadcast stations, student journalists and League of Women Voters chapters. The volunteers, representing themselves only as interested

citizens, visited their local LEPC offices and asked for a copy of the Community Emergency Response Plan.

Some officials, becoming suspicious when asked for the seldom-requested plan, contacted police. In several states, officials sent e-mails to colleagues in other emergency planning agencies warning of the audit.

Among those who found themselves the subject of officials' interest was Meredith Heagney of The Columbus Dispatch, whose audit queries prompted the Ohio State Highway Patrol to e-mail the state's 88 counties asking that they be alerted of similar requests. Heagney obtained copies of several messages among officials wondering who she was and why she wanted the information.

"[A]lthough the information being requested was not illegal it was odd," Dennis Tomcik, branch chief of field operations, training and exercise for the Ohio Emergency Management Agency, wrote of one of Heagney's requests.

Tomcik asked that his e-mail recipients who are "getting strange requests for information" to call either him or the Strategic Analysis and Information Center of the Ohio State Highway Patrol.

In e-mail messages later that day, county emergency managers noted, "We had the same weirdo yesterday," and "Hey, glad to hear that we aren't the only one with weird people showing up."

Of the seven plans Heagney requested, four were provided in full, two in part and one was denied.

In Chillicothe, Ohio, Vicki Carter, an administrative assistant, told reporter Ashley Lykins of the Chillicothe Gazette: "I can't understand why the media [are] going all over the nation trying to get these plans and keep their identity a secret." Lykins got the plan in part.

Denver Post reporter George Merritt was denied the plan and was told that a national alert went out about the audit because there was "a rash of people around the country posing as reporters and asking for emergency response plans."

Rupert Lacy, the deputy director of Harrison County Emergency Management and Homeland Security in Mississippi, told Mike Keller of The Sun Herald in Gulfport that he received a state alert passed on from a national bulletin by the Federal Emergency Management Agency alerting local officials to the national audit. Lacy insisted that the agency "was not trying to hide anything," but he would not release the report to Keller.

When Kelly Fernandes of The Enterprise in Brockton, Mass., walked into the Emergency Management Agency in Carver, Mass., Director Tom Walsh said, "I know what game you're playing with this audit." Walsh refused to accept Fernandes' simple written request, she reported in the audit. "My answer to you is no," Walsh said.

The fire chief in nearby Franklin, Mass., told Paul Crocetti of The Milford (Mass.) Daily News that he was "famous – the departments have been chatting." He was able to get part of the plan.

### **Calling All Cars**

In addition to passing the word between themselves about the audit, some public officials also alerted police or ran background checks on requesters, several auditors reported.

When Bruce Rushton returned empty-handed to the newsroom of The State Journal-Register in Springfield, Ill., from a visit to Sangamor County Office of Emergency Management, the police reporter told him she heard his name broadcast over the police scanner.

"Someone was running my name through NCIC, a national database that contains criminal histories and is available only to law enforcement," Rushton reported. "Besides my name, they [had] my home address and plate number." He guessed someone had jotted down his license number as he drove away.

The same kind of background check was run on Chris Joyner of The Clarion-Ledger in Jackson, Miss., when he requested the Hinds County Comprehensive Emergency Response Plan. Emergency Management Director Larry Fisher asked Joyner for his driver's license, saying the Mississippi Joint Terrorism Task Force requires identification checks.

Fisher took the license and left the room. When he returned, he told Joyner he had called the Hinds County Sheriff's Department and "had a criminal background check performed on me," Joyner reported. "He also said he had notified the FBI and the Mississippi Joint Terrorism Task Force and informed them that I wanted to look at the plan 'and wouldn't say why.' "

"We don't consider [the plan] a public document," Fisher advised Joyner, but nonetheless gave him a notebook containing the plan.

Bill Lawson of the North Little Rock (Ark.) Times received a copy of that community's plan, but not before a public official questioned him about his background, including whether he had been in the Army.

"They did call the North Little Rock Police Department, who stood at a distance and watched me until I left," Lawson reported in the audit. "They did not approach me, but I am certain that they 'ran' my license plate."

And Heagney, the Columbus Dispatch reporter whose requests sparked the statewide e-mail alert, was sitting in her car taking notes about being denied access to the plan at the nearby Pickaway County Emergency Management Agency when police arrived.

"A cruiser pulled up behind me, and a police officer approached the car," Heagney reported in the audit. "He told me there was a report that I had been engaging in suspicious activity, and the EMA director had called the police. I had to tell him everything, and he was very supportive ... and he thought I was doing a good thing."

### **Don't Know, Don't Care**

Fewer than 2 percent of the officials asked for the report apparently did not understand the request and did not appear eager to help.

Stan Diel of The Birmingham (Ala.) News visited the Cullman County Local Emergency Planning Committee office four times in two days. Each time, he found the office unstaffed. Repeated phone calls to the office went unanswered.

An official with Massachusetts' Ashland Fire Department gave requester John Hilliard a plan, but it turned out to be the town's building code. The official looked for the CERP plan, which he could not find. "The book and the discs aren't where they're supposed to be," he told Hilliard, a reporter for the MetroWest Daily News in Framingham.

When Dan Wilson of The Post Crescent in Appleton, Wis., was given a disc and told it contained the Waupaca County's plan; the disc was blank. Next, he was given a three-ring binder, only to be later called and told that it was the wrong book. Finally, Wilson got the plan, but it was missing many parts.

Andrew Hill of The Daily Universe at Brigham Young University said officials he encountered in Rich County, Utah were "completely clueless. The woman in the county clerk's office didn't know anything about it," Hill said. She referred him to the sheriff's office but when he arrived, he was told that the man he had been directed to ask for "was only seasonally employed ...and wouldn't be the man who had the record."

## **What is the Law?**

Under the Emergency Planning and Community Right-to-Know Act of 1986, every state is required to have a State Emergency Response Commission that establishes the number and jurisdiction of its Local Emergency Planning Committees. Those committees are tasked with developing and updating the Comprehensive Emergency Response Plan.

The federal law mandating such planning in the event of a hazardous materials spill clearly says that each emergency response plan "shall be made available to the general public ... during normal working hours at the location or locations designated by the administrator, governor, state emergency response commission, or local emergency planning committee, as appropriate." (U.S. Code, Title 43, Chapter 116, Subchapter II, § 11044)

The law also allows officials to keep secret the location of specific chemicals if an owner or operator of a facility storing the chemicals requests that the information be shrouded. Such information is collected in a separate, Tier II report that is not made public.

Six auditors in 10 did not have to inform the clerk or official to whom the request was made about the law. A few respondents reported that officials were well-versed on the law's openness requirements.

Ed Gaugh, director the Emergency Management Agency in Somerville, Tenn., "definitely knows the law and is not hesitant about allowing the public to view public records and information," reported auditor Cassandra Kimberly of the University of Memphis and The Commercial Appeal in Memphis.

But the others encountered officials who were not familiar with the law.

While Mary C. Moewe of The Daytona Beach News-Journal was waiting for an East Central Florida Regional Planning Council clerk to find the plan, she used a public access computer to find the section of federal law mandating the plans be public. Moewe cited the law several times in her attempt to get the plan, which was eventually provided.

Drake Lucas of The Eagle-Tribune in North Andover, Mass., obtained his community's plan after the director of the North Andover Emergency Management Office gave him a password to access it online and said Lucas could see it only because the director trusts him.

Lucas reported in the audit that he told the director that "the information is public and should be available to anyone whether or not he knows them. He

said he called the state to ask if that was true, spoke to someone in [the Massachusetts Environmental Policy Act Office] and they didn't know whether the information should be public."

Lucas read him the federal law governing disclosure of CERP plans. The director replied, incorrectly, that under the USA PATRIOT Act, passed in the wake of Sept. 11, 2001, the information is no longer public.

Several reporters in Connecticut, Illinois and Nevada were told that their state's law bars the information from release, though the plans are governed by federal law, which supersedes the state rule. Meanwhile, auditors who requested plans in other communities in those same states were given the plans in full.

The Connecticut Post's Aaron Leo was denied a request for Bridgeport's Emergency Response Plan by officials who cited an exemption to the state Freedom of Information law that allows officials to keep secret "emergency plans and emergency recovery or response plans."

One Connecticut requester was told to submit a state FOI request, while another requester there was denied the plan because someone at the federal Department of Homeland Security advised a fire official not to release it. "It's not that we're trying to hide anything," Art Reid, deputy fire chief of the Fairfield Fire Department, told the requester.

In four other Connecticut audits, however, the plans were provided in full.

A similar exemption to the Illinois Freedom of Information Act was cited by public officials in two agencies who withheld the plans while their counterparts in two other agencies released the plan in full.

### **Terrorism Concerns**

Terrorism was mentioned repeatedly as a reason for keeping the plans secret.

Butler Cain of Alabama Public Radio was told by an official at the Tuscaloosa County Emergency Management Agency "that since 9/11, the Community Emergency Response Plan has been kept 'under lock and key' because of security issues."

Hillary Green of 6News in Lawrence, Kan., reported in her audit that as she looked at the Jefferson County plan, "the manager was watching me and reminding me that it was under lock and key and 24-hour surveillance."

Violet Law of The Allegheny Front in Pittsburgh, Pa., was allowed to review and take notes from the plan, but could not obtain a copy from public officials. "They explained that they wouldn't like their 'playbook' falling into 'the wrong hands.'"

Molly Peterson, a freelance radio reporter in Louisiana, was denied access to the plan by a New Orleans official who told her, with a wink, that it "wasn't the kind of information we want the terrorists to get."

Several auditors noted that they were told they were getting the document because they didn't look like terrorists.

### **Full Disclosure**

Not all requesters faced roadblocks. Ernst Lamothe Jr. of New York's Rochester Democrat & Chronicle spent two minutes in the Ontario County Emergency Management office, where he obtained a free copy of the plan, which was posted on the Web.

"Everybody there was friendly," Lamothe reported in the audit. "It was fast and easy."

"Very simple," echoed Karen Dillon of The Kansas City (Mo.) Star about her experience with the Douglas County Emergency Management office in Kansas. The emergency management director not only gave Dillon the Web address for the document, but also went online to show her how to get it.

The Blount County (Ala.) Emergency Management office handed over the document but declined Stan Diel's offer to pay for copying the plan. "The staffer refused payment, saying the information is public record, and the county doesn't charge for access to public information," reported Diel of The Birmingham News.

An official with the Allamakee County (Iowa) Emergency Management told auditor Kelli Boylen in an e-mail message not to hesitate to call with questions.

"It's nice to see someone interested in the county disaster plan. In the next few months I hope to get this out to other public and private organization with-in [sic] the county and the general public. We need more awareness on what to do during an incident for the safety of everyone," Don Peters, the county's emergency management coordinator wrote Boylen of The (Cedar Rapids) Gazette.



In Puerto Rico, officials not only e-mailed the requested information but also did not hesitate to tell requester Maggie Bobb of El Vocero in San Juan that most of the island's plans had not been updated since the 1980s.

In a few cases, requesters found that the plans were kept by public officials working out of their homes or businesses, although that did not necessarily hinder disclosure.

For example, when Becky Manley of The Journal Gazette in Fort Wayne, Ind., called Russell Cartreaux, the keeper of Noble County's comprehensive emergency plan, to find out his office hours, she learned that he works from his television shop in Avilla. When she went to his store, he offered to let her take the plan so she could copy it herself. He ended up making her a copy, which she picked up the next day. Manley noted that the county is in the process of replacing Cartreaux with a full-time person.

# **Audit Results: Sunshine Week 2007 National Information Audit of Comprehensive Emergency Response Plans**

## **Overview**

The database consists of 375 responses made to 363 Local Emergency Planning Committee offices and other custodians of CERP plans. (Note on 12 occasions, two different requestors audited the same office. The results were different enough to warrant inclusion, with some of the requests to the same offices denied while others were filled.)

### **Nationwide: 375 audits**

36 states and 1 U.S. territory

CERP provided:

In Full: 44 percent, 166 requests

In Part: 19 percent, 73 requests

Denied: 36 percent, 136 requests

### **New England: 93 audits**

Connecticut, Massachusetts, New Hampshire, Rhode Island

CERP provided:

In Full: 35 percent, 33 requests

In Part, 18 percent, 17 requests

Denied: 46 percent, 43 requests

### **Mid Atlantic: 52 audits**

Maryland, New Jersey, New York, Pennsylvania

CERP provided:

In Full: 31 percent, 16 requests

In Part: 23 percent, 12 requests

Denied: 46 percent, 24 requests

### **South: 75 audits**

Alabama, Arkansas, Florida, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Virginia

CERP provided:

In Full: 63 percent, 47 requests

In Part: 15 percent, 11 requests

Denied: 23 percent, 17 requests

**Midwest: 100 audits**

Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, Ohio, Wisconsin

CERP provided:

In Full: 47 percent, 47 requests

In Part: 23 percent, 23 requests

Denied: 30 percent, 30 requests

**West: 35 audits**

Colorado, New Mexico, South Dakota, Texas, Utah

CERP provided:

In Full: 34 percent, 12 requests

In Part: 23 percent, 8 requests

Denied: 43 percent, 15 requests

**Far West: 19 audits**

Arizona, California, Nevada, Washington

CERP provided:

In Full: 53 percent, 10 requests

In Part: 16 percent, 3 requests

Denied: 32 percent, 6 requests

**Puerto Rico: 1 audit**

CERP provided in full

**Fees Charged**

For the vast majority of requests, 340, no fees were charged to obtain a copy of the CERP.

In the remaining 35 requests, however, total fees ranged from \$1.50 per document to \$1,714 per document.

In the 35 audits where a fee was charged, the \$1,714 drove up the average cost to \$79.22. Removing the \$1,714 dropped the average to \$31.14.

**Requests in Writing:**

22 percent (82 requesters) were required to put their request in writing.

**Redacted Information:**

14 percent (54 requesters) said the information in the plans they received was redacted in some way.

**Availability in Electronic Format:**

30 percent of the total requests (111 plans) are available in electronic format.

**Availability on the Internet:**

13 percent of the total requests (48 plans) are available on the Internet.

**Auditors Request a Supervisor:**

14 percent (52 respondents) said they had to request a supervisor during the process.

**Clerk/Official Confers With a Supervisor:**

45 percent (169 respondents) said the clerk/official had to confer with a supervisor.

**Auditor Required to Identify Him/Herself:**

61 percent (228 respondents) said they were asked to identify themselves.

**Auditor Required to Show Identification:**

8 percent (31 respondents) said they were required to show identification.

**Auditor Asked to Explain Why Seeking Information:**

54 percent (203 respondents) were asked to explain why they wanted the information.

**Auditor Asked to Complete/Sign Forms:**

11 percent (42 respondents) said they had to complete/sign forms.

**Auditor Requested and Received Copies of Documents Required to Sign:**

5 percent (20 respondents) requested and received a copy of everything they had to sign.

**Auditor Asked to Cite the Law Governing Release:**

4 percent (14 respondents) were asked to cite the law dictating disclosure.

**Auditor Informed the Clerk/Official About the Law:**

40 percent (149 respondents) informed the clerk/official that the law permits the public to have public documents such as the emergency response plan

**For More Information Contact:**

Debra Gersh Hernandez  
Sunshine Week  
703-807-2100; dghernandez@asne.org

Pete Weitzel  
Coalition of Journalists for Open Government  
703-807-2100; pweitzel@cjog.net

*Audit Report Database Creation and Analysis: Kirsten B. Mitchell*  
*Audit Database Collection and Audit Facilitation: Judith A. Burrell*

| Region/state                          | All        | New England* | Mid-Atlantic* | South*   | Midwest* | West*   | Far West*  |
|---------------------------------------|------------|--------------|---------------|----------|----------|---------|------------|
| Total responses                       | <b>375</b> | 93           | 52            | 75       | 100      | 35      | <b>19</b>  |
| Received in full                      | <b>166</b> | 33           | 16            | 47       | 47       | 12      | <b>10</b>  |
| % of total                            | 44%        | 35%          | 31%           | 63%      | 47%      | 34%     | <b>53%</b> |
| Received in part                      | <b>73</b>  | 17           | 12            | 11       | 23       | 8       | <b>3</b>   |
| % of total                            | 19%        | 18%          | 23%           | 15%      | 23%      | 23%     | <b>16%</b> |
| Request denied                        | <b>136</b> | 43           | 24            | 17       | 30       | 15      | <b>6</b>   |
| % of total                            | 36%        | 46%          | 46%           | 23%      | 30%      | 43%     | <b>32%</b> |
| Total fees                            | \$2,772.78 | \$451.27     | \$1,804.75    | \$232.25 | \$226.35 | \$31.76 | \$26.40    |
| Request in writing                    | <b>82</b>  | 17           | 23            | 5        | 17       | 16      | <b>4</b>   |
| Info redacted                         | <b>54</b>  | 15           | 12            | 5        | 16       | 4       | <b>2</b>   |
| Electronic format                     | <b>111</b> | 20           | 8             | 31       | 38       | 6       | <b>7</b>   |
| On the Internet                       | 48         | 10           | 5             | 10       | 13       | 1       | <b>8</b>   |
| Auditor request supervisor            | <b>52</b>  | 12           | 8             | 9        | 16       | 6       | <b>1</b>   |
| Official confer with supervisor       | <b>169</b> | 45           | 28            | 29       | 42       | 16      | <b>8</b>   |
| Auditor asked to ID self              | <b>228</b> | 52           | 36            | 39       | 65       | 20      | <b>15</b>  |
| Auditor asked to show ID              | 31         | 9            | 7             | 6        | 3        | 5       | <b>1</b>   |
| Explain why want document             | <b>203</b> | 53           | 31            | 29       | 58       | 22      | <b>10</b>  |
| Asked to complete, sign forms         | <b>42</b>  | 6            | 12            | 6        | 10       | 5       | <b>3</b>   |
| Get a copy of forms                   | <b>20</b>  | 4            | 3             | 3        | 8        | 2       | <b>0</b>   |
| Auditor asked to cite law             | 14         | 3            | 2             | 3        | 3        | 3       | <b>0</b>   |
| Auditor Inform official about the law | <b>149</b> | 36           | 30            | 20       | 39       | 17      | <b>7</b>   |

| Region/state                          | AL | AR | AZ | CA  | CO | CT      | FL      | IA      | IL |
|---------------------------------------|----|----|----|-----|----|---------|---------|---------|----|
| Total responses                       | 11 | 14 | 4  | 2   | 2  | 7       | 9       | 14      | 7  |
| Received in full                      | 6  | 9  | 0  | 0   | 1  | 4       | 6       | 8       | 2  |
| % of total                            | 55 | 64 | 0  | 0   | 50 | 57      | 67      | 57      | 29 |
| Received in part                      | 1  | 3  | 3  | 0   | 0  | 0       | 3       | 1       | 0  |
| % of total                            | 9  | 21 | 75 | 0   | 0  | 0       | 33      | 7       | 0  |
| Request denied                        | 4  | 2  | 1  | 2   | 1  | 3       | 0       | 5       | 5  |
| % of total                            | 36 | 14 | 25 | 100 | 50 | 43      | 0       | 36      | 71 |
| Total fees                            | -- | -- | -- | --  | -- | \$10.00 | \$18.75 | \$50.00 | -- |
| Request in writing                    | 0  | 0  | 2  | 1   | 0  | 2       | 0       | 1       | 2  |
| Info redacted                         | 0  | 0  | 2  | 0   | 0  | 0       | 3       | 1       | 1  |
| Electronic format                     | 4  | 5  | 0  | 0   | 0  | 2       | 5       | 4       | 0  |
| On the Internet                       | 2  | 2  | 0  | 0   | 0  | 0       | 1       | 0       | 0  |
| Auditor request supervisor            | 2  | 1  | 0  | 0   | 1  | 1       | 2       | 3       | 3  |
| Official confer with supervisor       | 3  | 5  | 3  | 1   | 2  | 0       | 3       | 6       | 3  |
| Auditor asked to ID self              | 6  | 6  | 4  | 1   | 2  | 1       | 4       | 8       | 4  |
| Auditor asked to show ID              | 1  | 0  | 0  | 0   | 2  | 0       | 0       | 0       | 0  |
| Explain why want document             | 4  | 3  | 4  | 1   | 2  | 2       | 4       | 8       | 5  |
| Asked to complete, sign forms         | 0  | 1  | 2  | 0   | 0  | 1       | 1       | 2       | 2  |
| Get a copy of forms                   | 0  | 1  | 0  | 0   | 0  | 2       | 0       | 2       | 0  |
| Auditor asked to cite law             | 0  | 1  | 0  | 0   | 0  | 0       | 2       | 3       | 0  |
| Auditor Inform official about the law | 1  | 3  | 3  | 2   | 1  | 1       | 3       | 8       | 5  |

| Region/state                          | IN      | KS      | LA  | MA       | MD         | MI  | MN   | MO  | MS      |
|---------------------------------------|---------|---------|-----|----------|------------|-----|------|-----|---------|
| Total responses                       | 15      | 18      | 2   | 71       | 24         | 10  | 1    | 10  | 6       |
| Received in full                      | 9       | 8       | 0   | 23       | 5          | 2   | 0    | 6   | 3       |
| % of total                            | 60%     | 44%     | 0%  | 32%      | 21%        | 20% | 0%   | 60% | 50%     |
| Received in part                      | 1       | 6       | 1   | 14       | 5          | 1   | 1    | 2   | 0       |
| % of total                            | 7%      | 33%     | 50% | 20%      | 21%        | 10% | 100% | 20% | 0%      |
| Request denied                        | 5       | 4       | 1   | 34       | 14         | 7   | 0    | 2   | 3       |
| % of total                            | 33%     | 22%     | 50% | 48%      | 58%        | 70% | 0%   | 20% | 50%     |
| Total fees                            | \$28.00 | \$15.00 | --  | \$376.07 | \$1,714.00 | --  | --   | --  | \$63.50 |
| Request in writing                    | 6       | 2       | 0   | 13       | 9          | 2   | 0    | 1   | 4       |
| Info redacted                         | 0       | 0       | 0   | 13       | 5          | 1   | 1    | 2   | 0       |
| Electronic format                     | 7       | 7       | 1   | 12       | 4          | 3   | 1    | 4   | 0       |
| On the Internet                       | 1       | 6       | 1   | 9        | 2          | 1   | 0    | 3   | 0       |
| Auditor request supervisor            | 1       | 4       | 0   | 6        | 4          | 2   | 1    | 0   | 1       |
| Official confer with supervisor       | 6       | 8       | 1   | 38       | 14         | 6   | 1    | 4   | 4       |
| Auditor asked to ID self              | 12      | 13      | 2   | 38       | 18         | 6   | 1    | 6   | 5       |
| Auditor asked to show ID              | 1       | 2       | 0   | 6        | 5          | 0   | 0    | 0   | 2       |
| Explain why want document             | 11      | 12      | 1   | 38       | 17         | 7   | 1    | 5   | 6       |
| Asked to complete, sign forms         | 0       | 2       | 0   | 4        | 4          | 0   | 1    | 0   | 3       |
| Get a copy of forms                   | 2       | 1       | 0   | 1        | 0          | 0   | 0    | 0   | 1       |
| Auditor asked to cite law             | 0       | 0       | 0   | 3        | 1          | 0   | 0    | 0   | 0       |
| Auditor Inform official about the law | 5       | 3       | 1   | 28       | 15         | 7   | 1    | 5   | 5       |



| Region/state                          | NC  | NE   | NH      | NJ   | NM   | NV   | NY      | OH      | PA      |
|---------------------------------------|-----|------|---------|------|------|------|---------|---------|---------|
| Total responses                       | 19  | 2    | 10      | 1    | 1    | 2    | 17      | 16      | 10      |
| Received in full                      | 13  | 2    | 3       | 1    | 1    | 2    | 9       | 8       | 1       |
| % of total                            | 68% | 100% | 30%     | 100% | 100% | 100% | 53%     | 50%     | 10%     |
| Received in part                      | 2   | 0    | 2       | 0    | 0    | 0    | 3       | 6       | 4       |
| % of total                            | 11% | 0%   | 20%     | 0%   | 0%   | 0%   | 18%     | 38%     | 40%     |
| Request denied                        | 4   | 0    | 5       | 0    | 0    | 0    | 5       | 2       | 5       |
| % of total                            | 21% | 0%   | 50%     | 0%   | 0%   | 0%   | 29%     | 13%     | 50%     |
| Total fees                            | --  | --   | \$65.20 | --   | --   | --   | \$68.25 | \$29.60 | \$22.50 |
| Request in writing                    | 0   | 0    | 1       | 0    | 0    | 0    | 8       | 2       | 6       |
| Info redacted                         | 0   | 0    | 1       | 0    | 0    | 0    | 5       | 5       | 2       |
| Electronic format                     | 10  | 2    | 5       | 1    | 0    | 1    | 2       | 6       | 1       |
| On the Internet                       | 3   | 0    | 1       | 0    | 0    | 2    | 3       | 0       | 0       |
| Auditor request supervisor            | 2   | 0    | 4       | 0    | 0    | 1    | 3       | 1       | 1       |
| Official confer with supervisor       | 8   | 0    | 5       | 0    | 0    | 4    | 6       | 4       | 8       |
| Auditor asked to ID self              | 10  | 2    | 9       | 1    | 0    | 1    | 10      | 10      | 7       |
| Auditor asked to show ID              | 2   | 0    | 2       | 0    | 0    | 0    | 0       | 0       | 2       |
| Explain why want document             | 7   | 0    | 8       | 0    | 0    | 1    | 9       | 7       | 5       |
| Asked to complete, sign forms         | 1   | 0    | 1       | 0    | 0    | 0    | 5       | 3       | 3       |
| Get a copy of forms                   | 0   | 0    | 1       | 0    | 0    | 0    | 2       | 3       | 1       |
| Auditor asked to cite law             | 0   | 0    | 0       | 0    | 0    | 0    | 1       | 0       | 0       |
| Auditor Inform official about the law | 5   | 0    | 5       | 1    | 0    | 0    | 7       | 3       | 7       |

| Region/state                          | RI  | SC  | SD   | TN  | TX      | UT     | VA       | WA      | WI       | PR   |
|---------------------------------------|-----|-----|------|-----|---------|--------|----------|---------|----------|------|
| Total responses                       | 5   | 7   | 1    | 6   | 9       | 22     | 2        | 11      | 6        | 1    |
| Received in full                      | 3   | 5   | 0    | 4   | 3       | 7      | 2        | 8       | 1        | 1    |
| % of total                            | 60% | 71% | 0%   | 67% | 33%     | 32%    | 100%     | 73%     | 17%      | 100% |
| Received in part                      | 1   | 1   | 1    | 0   | 3       | 4      | 0        | 0       | 5        | 0    |
| % of total                            | 20% | 14% | 100% | 0%  | 33%     | 18%    | 0%       | 0%      | 83%      | 0%   |
| Request denied                        | 1   | 1   | 0    | 2   | 3       | 11     | 0        | 3       | 0        | 0    |
| % of total                            | 20% | 14% | 0%   | 33% | 33%     | 50%    | 0%       | 27%     | 0%       | 0%   |
| Total fees                            | --  | --  | --   | --  | \$24.51 | \$7.25 | \$150.00 | \$26.40 | \$103.75 | --   |
| Request in writing                    | 1   | 1   | 0    | 0   | 6       | 10     | 0        | 1       | 1        | 0    |
| Info redacted                         | 1   | 2   | 0    | 0   | 1       | 3      | 0        | 0       | 5        | 0    |
| Electronic format                     | 1   | 2   | 1    | 3   | 2       | 3      | 2        | 6       | 3        | 1    |
| On the Internet                       | 0   | 1   | 0    | 1   | 0       | 1      | 0        | 6       | 1        | 0    |
| Auditor request supervisor            | 1   | 1   | 1    | 0   | 0       | 4      | 0        | 0       | 1        | 0    |
| Official confer with supervisor       | 2   | 3   | 0    | 1   | 5       | 9      | 1        | 3       | 4        | 1    |
| Auditor asked to ID self              | 4   | 3   | 1    | 2   | 6       | 11     | 1        | 9       | 3        | 1    |
| Auditor asked to show ID              | 1   | 0   | 0    | 0   | 2       | 1      | 1        | 1       | 0        | 0    |
| Explain why want document             | 5   | 1   | 0    | 3   | 6       | 14     | 0        | 4       | 2        | 0    |
| Asked to complete, sign forms         | 0   | 0   | 0    | 0   | 2       | 3      | 0        | 1       | 0        | 0    |
| Get a copy of forms                   | 0   | 1   | 0    | 0   | 2       | 0      | 0        | 0       | 0        | 0    |
| Auditor asked to cite law             | 0   | 0   | 0    | 0   | 0       | 3      | 0        | 0       | 0        | 0    |
| Auditor Inform official about the law | 2   | 1   | 0    | 2   | 4       | 12     | 0        | 2       | 1        | 0    |

**\* Regions: New England: CT, MA, NH, RI; Mid-Atlantic: MD, NJ, NY, PA; South: AL, AR, FL, LA, MS, NC, SC, TN, VA; Midwest: IA, IL, IN, KS, MI, MN, MO, NE, OH, WI; West: CO, NM, SD, TX, UT; Far West: AZ, CA, NV, WA**