

Department of Public Safety Driver and Vehicle Services Division

Motor Vehicle Registration Compliance Working Group

Report to the Minnesota Legislature

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Executive summary

In 2024, the Minnesota Legislature appropriated funding for the Minnesota Department of Public Safety's Driver and Vehicle Services (DVS) division to form a Motor Vehicle Registration Compliance Working Group. Per statute, this group was tasked with identifying and evaluating potential methods for enforcing registration compliance that would "replace enforcement through the use of criminal penalties, including but not limited to: 1) alignment with individual income taxes, 2) revenue recapture, and 3) retention of license plates with a vehicle following change of vehicle ownership" (Minnesota Statutes 2024, H.F. 5216, Chapter 123).

Part of the impetus for this work came from legislators' concerns about Black drivers and drivers of color being disproportionately represented in traffic stops and vehicle searches (Minnesota Department of Human Rights, 2022; NYU, 2020). Knowing that traffic stops, including those related to expired registration, can result in the loss of life, such as in the case of Philando Castile, legislators asked working group members to explore alternatives to enforcing registration compliance.

The Motor Vehicle Registration Compliance Working Group consisted of representatives from 16 different entities (see Appendix for full list of working group members) who met four times between the enactment of statute and the end of the calendar year.

Registration compliance in Minnesota

Keeping Minnesota's roads safe and in good working condition requires consistent funding, which comes from a complex set of sources at the federal, state, and local levels. In fiscal year 2024, the Minnesota Department of Transportation (MnDOT) received approximately \$4.98 billion in revenue for transportation; \$2.7 billion (or 54 percent) of that funding came from state sources known as the Highway User Tax Distribution (HUTD) Fund.

Vehicle registration tax and fees account for roughly one-third of the HUTD Fund and 18 percent of overall funding for transportation in Minnesota (MnDOT, 2024).

In 2023, there were 5,404,121 actively registered vehicles in Minnesota whose registration was set to expire. Of those vehicles that required registration renewal in 2023, 60 percent were renewed on time, 27 percent were renewed late, and 16 percent were not renewed at all (at least as of the most recent data available). According to FAST Enterprises, a software consultant for the state of Minnesota who is the vendor who supplies the MNDRIVE system to Driver and Vehicle Services (DVS):

- Late and noncompliant registration behaviors have been consistent in Minnesota over the past several years.
- By far, vehicles are most often out of compliance in February. This is likely because all travel
 trailer and motorcycle registrations come due in February and people have vehicles that are
 stored away for the winter and forget about or delay renewing their registration. Therefore,
 noncompliant registration does not necessarily mean noncompliant vehicle operation.

Compliance data were pulled for the working group by FAST Enterprises on December 12, 2024.

Evaluation of alternative compliance methods

To help explore options for vehicle registration compliance, and to author this legislative report, DVS contracted with Wilder Research. Part of Wilder's work included data collection from: 1) interviews with working group members (14 entities out of 16 participated), 2) an environmental scan of other jurisdictions (outside of Minnesota) to look for promising practices related to enforcing compliance in vehicle registration, and 3) a brief survey asking members to rate the potential options based on criteria outlined in legislative statute (10 out of 16 entities responded).

Members of the Motor Vehicle Registration Compliance Working Group were asked to evaluate potential alternatives to criminal penalties for registration noncompliance using five key criteria:

- **Effectiveness:** The proposed method would increase the rate of on-time vehicle registration compliance.
- Administrative efficiency: The proposed method would *not* increase administrative burden (e.g., state resources) or require excessive new infrastructure; it would provide an equal or positive return on investment.
- **Equity:** The proposed method would be fair, just, and accessible to all Minnesotans, ensuring that no specific group is disproportionately impacted.
- **Burdens on motor vehicle owners:** The proposed method would include easy steps or processes that minimize time and financial impact on vehicle owners.
- Substantial elimination of vehicle registration enforcement through traffic stops performed by peace officers: The proposed method would eliminate or reduce the need for peace officers to make traffic stops for expired tabs.

The results of these data collection activities are detailed in the full report. Below are the conclusions and legislative proposals based on the findings. The audience for this report is the Minnesota Legislature.

Conclusions and legislative proposals

Based on input from working group members, as well as the literature from the environmental scan, there are several conclusions that the Legislature should consider in moving this work forward. Working group members discussed the importance of holding drivers accountable for vehicle ownership and registration compliance, but also making the process efficient and easy to remember and understand.

- 1. The literature related to increasing compliance points to the need for multiple approaches. Wilder found limited existing research specifically related to registration compliance, but did find several articles focused on increasing compliance with traffic laws, such as wearing seat belts and obeying speed limits. A common theme throughout this research is that multiple approaches are needed to increase compliance with the law. It is also important to know who is noncompliant and why.
- 2. Working group members were most supportive of the Legislature considering a targeted education campaign at DVS locations. Of all options explored, a "targeted campaign at DVS locations" received the highest number of votes in support of the Legislature considering this option. DVS offices would include offices run by deputy registrars on behalf of DVS. Increased education, especially around *why* registration compliance is important (e.g., what is funded with those dollars), is appealing partly because it would be low-burden for drivers, as well as equitable and

- administratively efficient. Studies reviewed in the environmental scan also recommend public education as a way of increasing registration compliance.
- 3. Most members were also interested in practices that would increase efficiency of the registration process. Being able to renew tabs automatically with a credit card, or renewing them online with in-person pickup, were identified by working group members as popular methods of increasing compliance. Both options would reduce the burden on drivers and allow people to remain in compliance even if they forget to renew on their own. As seen in a study from Wisconsin, when noncompliant vehicle owners were asked about why they were noncompliant, the most common answer by far was that they forgot (Schoech & Schoenherr, 2014, p. 1).
- 4. There is support for Automatic License Plate Readers in increasing registration compliance. Many working group members were supportive of the Legislature exploring Automatic License Plate Readers to help increase registration compliance. As with any surveillance technology, however, there are concerns about balancing its potential effectiveness with protecting Minnesotans' privacy. Several articles from the environmental scan cautioned about the need to thoroughly outline methods for data collection, management, and storage. It is also important to recognize that this technology has the potential to disproportionately impact communities of color if not implemented carefully. UCLA's School of Law talks about racial biases easily being transferred from one system of enforcement to another, especially surveillance:

The risk that automation—like traditional traffic enforcement—will be employed disproportionately in the most politically vulnerable communities remains high. Therefore, even though automated enforcement methods create the possibility of reducing racialized policing by eliminating officer discretion in assessing tickets, they can exacerbate the extent to which traffic enforcement is made a tool of financial extraction from communities of color (Colgan, 2023, p. 943).

- 5. Working group members were split on the idea of completely eliminating criminal penalties for noncompliant registration. The first duty outlined in statute for this working group was to "identify and evaluate potential methods for enforcement of motor vehicle registration and registration tax payment requirements that would replace enforcement through the use of criminal penalties" (Minnesota Statutes 2024, H.F. 5216, Chapter 123). Half of the working group members who took the final survey (5 out of 10) said they would recommend that the Legislature consider shifting from criminal to civil penalties for noncompliant registration. Members who were opposed to this idea argued that criminal penalties are a clear incentive for drivers to renew registration on time, while those against criminal penalties argued that expired tabs are not a public safety issue and that civil penalties would increase equity without compromising revenue. Given the divisiveness of this topic, it is important for the Legislature to continually explore the data and information coming out of jurisdictions that are making changes.
- 6. A cost-benefit analysis of each method would help assess their potential impact on criteria, especially equity. Because of the complexity and nuance involved with each proposed method, as well as the evaluation criteria—effectiveness, administrative efficiencies, equity, burden on motor vehicle owners, and substantial elimination of vehicle registration enforcement through traffic stops performed by peace officers—it would be beneficial to conduct a cost-benefit analysis ahead of any large-scale changes. Implementing some of the methods proposed could have broad ripple effects and it is difficult to say at this stage whether their investment would be worth the payoff of increased registration compliance. For any method that is pursued, it will also be important for Minnesota to look carefully at those jurisdictions that have already implemented changes to learn what has worked and what has not.

Introduction and context

Minnesota has one of the largest roadway systems in the United States. According to MnDOT:

Minnesota has the fourth largest system of streets, roads and highways in the country. As a whole, the network is made up of 142,865 centerline miles of public roadways across state, county, city and township systems. For context, the state ranks 22nd in population and 12th in geographic size (Minnesota Department of Transportation, 2022).

Keeping Minnesota's roads safe and in good working condition requires consistent funding, which comes from a complex set of sources at the federal, state, and local levels. According to a working group member, in fiscal year 2024, MnDOT received approximately \$4.98 billion in revenue for transportation; \$2.7 billion (or 54 percent) of that funding came from state sources known as the Highway User Tax Distribution (HUTD) Fund.

The role of vehicle registration in transportation funding

This report will focus on a specific portion of the \$2.7 billion in state-level funding: vehicle registration tax and fees. Vehicle registration tax and fees account for roughly one-third of the HUTD Fund and 18 percent of overall funding for transportation in Minnesota (MnDOT, 2024).

Table 1. FY24 sources of funding for the Highway User Tax Distribution Fund

Source	Dollars	Proportion of state funding
Vehicle registration tax and fees	\$914 million	34%
Fuel tax	\$886 million	33%
Motor vehicle sales tax	\$677 million	25%
State sales taxes	\$204 million	8%
Other sources	\$18 million	1%
Total	\$2.7 million	101% (due to rounding)

Source. MnDOT presentation to the working group on August 15, 2024.

The amount of money that Minnesotans pay in vehicle registration tax and fees "is determined by your vehicle's original value and age ... [and] revenue from vehicle taxes and fees goes entirely to support the roadway system—roads, bridges, sidewalks, and on-road bicycling and walking facilities" (MnDOT, n.d.). According to DVS, vehicles that are more than 10 years old pay a flat registration fee of \$20 per year.

Current level of compliance

Because these fees account for a substantial proportion of transportation funding, it is important for Minnesotans to pay them in a timely manner.

In 2023, there were 5,404,121 actively registered vehicles in Minnesota whose registration was set to expire.² Of those vehicles that required registration renewal in 2023, 60 percent were renewed on time, 27 percent were renewed late, and 16 percent were not renewed at all (at least as of the most recent data available).

During the August working group meeting, FAST Enterprises, a software consultant for the State of Minnesota, reported that:

- Late and noncompliant registration behaviors have been consistent in Minnesota over the past several years.
- By far, vehicles are most often out of compliance in February. This is likely because people have vehicles that are stored away for the winter and forget to renew their registration. Therefore, noncompliant registration does not necessarily mean noncompliant vehicle operation.
- Late renewals do not appear to be impacted by reminders.
- When customers renew late, they want to get their tabs immediately.

It is important to note that a couple of working group members voiced concerns regarding the legislative ask, saying it was unclear *why* members were tasked to explore this issue and also that noncompliance was not shown to be a significant issue in Minnesota. Continued work may require a broader approach and focus on the nuances of compliance data and the impacts of noncompliance on state funding.

Legislative working group

To further explore the intersection of equity and registration compliance, legislators appropriated funding to DVS to form a Motor Vehicle Registration Compliance Working Group. The duties for this group are outlined below:

- "(a) At a minimum, the working group must:
 - (1) identify and evaluate potential methods for enforcement of motor vehicle registration and registration tax payment requirements that would replace enforcement through the use of criminal penalties, including but not limited to:
 - (i) alignment with individual income taxes;
 - (ii) revenue recapture; and
 - (iii) retention of license plates with a vehicle following a change of vehicle ownership; and
 - (2) develop recommendations, a legislative proposal, or both, related to motor vehicle registration and registration tax compliance through methods other than the use of criminal penalties.
- (b) In evaluating methods under paragraph (a), clause (2), the working group must use criteria that include effectiveness, administrative efficiency, equity, burdens on motor vehicle owners, and substantial elimination of vehicle registration enforcement through traffic stops performed by peace officers" (Minnesota Statutes 2024, H.F. 5216, Chapter 123).

² Compliance data were pulled for the working group by FAST Enterprises on December 12, 2024.

The working group met four times between the enactment of statute and the end of calendar year 2024. Members included representatives from the following entities, including one person who represents Tribal governments:

- 1. Association of Minnesota Counties
- 2. American Automobile Association
- 3. Center for Transportation Studies at the University of Minnesota
- 4. Deputy Registrar Business Owners Association
- 5. League of Minnesota Cities
- 6. Minnesota Automobile Dealers Association
- 7. Minnesota Chiefs of Police Association
- 8. Minnesota Department of Corrections
- 9. Minnesota Department of Public Safety's Driver and Vehicle Services division
- 10. Minnesota Department of Revenue ("Revenue")
- 11. Minnesota Department of Transportation
- 12. Minnesota Deputy Registrars Association
- 13. Minnesota Police and Peace Officers Association
- 14. Minnesota Sheriff's Association
- 15. Minnesota State Patrol
- 16. Minnesota Transportation Alliance

See the Appendix for more information on who was involved in the Motor Vehicle Registration Compliance Working Group.

About this report

To explore options for vehicle registration compliance, and to author this legislative report, DVS contracted with Wilder Research. Staff from Wilder:

- Reviewed meeting minutes
- Conducted interviews with working group members (14 entities out of 16 participated)
- Conducted an environmental scan of other jurisdictions (outside of Minnesota) to look for promising practices related to enforcing compliance in vehicle registration
- Facilitated the working group meeting on November 20, 2024
- Conducted a brief survey (as follow-up to the November 20 meeting), asking members to rate the potential options based on criteria outlined in legislative statute (10 out of 16 entities responded)

For more information on the specific data collection methods and processes used to inform this report, see the Appendix. This report was written in collaboration between Wilder Research, the Minnesota Department of Public Safety (DPS), DVS, and working group members. It begins by examining several criteria for evaluating compliance options (per legislative statute), followed by a description of potential methods for increasing vehicle registration compliance. These methods come from three places: 1) 2024 legislative statute, 2) working group members, and 3) the environmental scan. The audience for this report is the Minnesota Legislature.

Evaluation criteria and considerations

The following section highlights the legislative evaluation criteria as well as key considerations for future work related to changing registration compliance policies and practices.

Legislative criteria for evaluating alternative methods

Members of the Motor Vehicle Registration Compliance Working Group were asked to evaluate potential alternatives to criminal penalties for registration noncompliance using five key criteria. Because some criteria could be defined broadly, Wilder Research and working group members used time during the November 20 meeting to discuss and sharpen definitions. Future work on registration compliance may need to focus on further defining and identifying the nuances of each criterion below:

- **Effectiveness:** The proposed method would increase the rate of on-time vehicle registration compliance.
- Administrative efficiency: The proposed method would *not* increase administrative burden (e.g., state resources) or require excessive new infrastructure; it would provide an equal or positive return on investment.
- Equity: The proposed method would be fair, just, and accessible to all Minnesotans, ensuring that no specific group is disproportionately impacted.
- **Burdens on motor vehicle owners:** The proposed method would include easy steps or processes that minimize time and financial impact on vehicle owners.
- Substantial elimination of vehicle registration enforcement through traffic stops performed by peace officers: The proposed method would eliminate or reduce the need for peace officers to make traffic stops for expired tabs.

Other considerations

In addition to these criteria, it is important to highlight a couple of considerations for readers as they review the findings and think through future work on motor vehicle registration compliance.

- 1. The proposed methods for improving registration compliance that are outlined in this report range in breadth and complexity. In the interest of thoroughness, all methods identified and discussed by the working group are listed in this report; however, this includes a wide range of ideas. Some methods would only apply to a subset of Minnesota drivers—for example, those who are selling a car—as opposed to the broader population of Minnesota drivers. In addition, some methods discussed relate to *identifying* noncompliance, while others focus on *enforcement* once those who are noncompliant are identified.
- 2. There were varying levels of participation from working group members, as well as a wide range of opinions. This report presents the aggregated opinions of working group members, but it is important to note that not all members provided feedback. While some members participated in all four meetings and completed all requested data collection activities, there were also some members who participated very little or not at all. In addition, some entities disagreed with the majority of members on specific proposed methods. For example, the Minnesota Deputy Registrar's Association wrote a letter expressing their concern about all of the methods listed in the legislative statute, as well as automatic renewal (which was the highest-rated method among other working group members), and Electronic Vehicle Registration.

Methods for improving motor vehicle registration compliance

Working group members were asked to evaluate compliance enforcement methods from four sources — the legislative mandate, working group members, guest speakers and the environmental scan.

Methods listed in legislative statute

Three of the methods explored in this report come from legislative statute (H.F. 5216, Chapter 123, Article 5, Section 16, Subdivision 5):

- Alignment with individual income taxes
- Revenue recapture
- Retention of license plates with a vehicle following a change of vehicle ownership

In November, Wilder Research asked working group members to rate "how well" each method met the five evaluation criteria, and also asked members to vote on whether they would recommend each method to the Legislature. The following table shows ratings based on 10 entities (out of a possible 16) who participated in the survey. See the Appendix for more detailed data tables illustrating all options presented in this report.

Table 2. Legislative methods: Working group member ratings and votes based on criteria

On a scale of 1 to 3, how well does each method meet the following criteria? ^a	Effective	Efficient (for administration)	Equitable	Low burden for drivers	Less enforcement through traffic stops	Would recommend to the Legislature
Retention of license plates with a vehicle following a change of vehicle ownership	2.44	2.22	2.33	1.89	1.89	7 votes "yes"
Revenue recapture	1.90	1.50	1.50	1.90	2.10	5 votes "yes"
Alignment with individual income taxes	1.90	1.40	1.70	1.90	2.00	5 votes "yes"

^a Ratings are based on the average score of 10 participating entities (out of 16), where 1=not very well, 2=somewhat well, and 3=very well.

Retention of license plates with a vehicle following a change of vehicle ownership

In Minnesota, it is common practice for license plates to stay with their original vehicle, meaning that, if a vehicle is sold, the license plate travels with the vehicle to the buyer rather than staying with the seller. This can cause issues for the seller if the buyer does not complete the sale transaction with the State of Minnesota.

A possible method for increasing vehicle registration compliance is for the State of Minnesota to amend current statute so that license plates must be removed from all vehicles at the time of sale. (It should be noted that as of October 1, 2024, any vehicle held for resale by a Minnesota auto dealer must have the plates removed.)

Out of all three methods listed in the statute, this was highest ranked by working group members. All members were given the chance to comment on the three legislative methods through a one-on-one interview with Wilder staff. The advantages and disadvantages of this approach, as described by participating working group members, are outlined below.

Retention of license plates with a vehicle following a change of vehicle ownership

Advantages

- It would put less burden on the seller of the vehicle in the event that the buyer is noncompliant with their registration.
- Neighboring states are already using this approach.

- It would create more work and require additional compensation for the deputy registrar offices.
- Record management may be difficult in private transactions or when moving plates to a new vehicle.
- If plates are required to be removed, but they are not removed, it makes it difficult for law enforcement to figure out what to do with the plates, vehicle, or driver (law enforcement is currently seeing this with the requirement of car dealerships to remove plates).
- It would increase the cost for the buyer of the vehicle because they would have to pay for new plates.

Revenue recapture

Another potential method explored was revenue recapture, which "allows the Minnesota Department of Revenue to recapture (take) your individual tax refunds or other payments and apply them to debts [that are being collected by] other agencies or the federal government" (Minnesota Department of Revenue, n.d.). Compared to other methods, revenue recapture ranked fairly low in terms of meeting all evaluation criteria. Members were split on whether they would recommend the Legislature consider this method (5 out of 10 members voted "yes").

The advantages and disadvantages of this approach, as described by participating working group members, are outlined in the table below. In addition, one member said this about revenue recapture:

This option falls most heavily on economically challenged communities. It is my experience in working with people who have been subject to revenue recapture, the process creates an incredible burden given the amount of fees and interest which are applied. A relatively small court obligation, for example, grows exponentially.

Revenue recapture

Advantages

- This approach has been used successfully with other agencies.
 One working group member stated, "Revenue recapture has been successfully utilized by over 700 qualifying agencies. In 2023, revenue recapture offset over \$59 million."
- It would require minimal agency resources.
- It would give the Minnesota
 Department of Revenue (Revenue)
 the authority to collect fees for state
 and deputy registrars.

- There may be difficulties with tracking vehicle ownership and collecting debts from the correct person if titles are out of date.
- It would compound economic burden for marginalized groups.
- There are fees attached to collecting debts (\$15 fee for each claim) and any interest is statutory by each agency.

Alignment with individual income taxes

The proposed method of aligning vehicle registration with the filing of individual income taxes ranked similarly to revenue recapture. Again, members were split (5 out of 10) on whether the Legislature should consider this option, and the overall criteria rating was fairly low compared to other methods (see Appendix table A2). In this scenario, vehicle owners would be asked to pay their vehicle registration taxes and fees at the same time and in the same system as yearly income tax filing.

The advantages and disadvantages of this approach, as described by participating working group members, are outlined below.

Alignment with individual income taxes

Advantages

- It would connect people to a process that already exists.
- It would occur at the same time every year.

- There are heavy administrative burden and cost concerns; for example, Revenue would have to cross-check and verify vehicle information, registration tax amount, and that the taxpayer is the vehicle owner.
- Revenue does not have information about how much a person owes, so people would have to calculate their own registration tax.
- It would be simpler if Minnesota had a flat registration fee, but it is regressive and would require substantial additional discussion.
- Currently, vehicle registration happens throughout the year (an advantage), which might be burdensome to change.
- Not everyone files income taxes.
- It would create a loss of revenue for the deputy registrar offices.
- It could delay the processing of tax returns, increasing public distrust and frustration with the state revenue system.
- With more information on a tax return, there would be increased risk related to ensuring data security/management.

Methods from the working group and environmental scan

The following section details methods that came from existing literature or the working group, either through presentations during the meetings or through individual interviews or surveys conducted by Wilder Research. The methods are presented in themes, as well as general order of popularity, based on the survey that was sent to working group members. Participants were asked to rate how well each method would meet the five criteria listed in legislative statute.

More efficient registration and renewal processes

Both existing literature and working group members discussed several methods for improving the efficiency of the registration and renewal process that may increase compliance without criminal penalties. Two of these methods—automatic renewal and online renewal, with the option to pick up tabs in person—had the highest ratings of all options in the survey. Below are selected quotes from working group members regarding technology and process improvement:

However, we can do it to make [registration] easier. I think Wisconsin uses kiosks in gas stations. Technology is everywhere, ease of transactions is looked for.

I think the auto renewal with a credit card is the best option; people are used to auto bill pay.

There should be a way for individuals to order their tabs online but pick an office they want to have process the renewal so they could do a pickup service. This would kind of work like a Target pickup service where you buy online but have your order fulfilled so there's no waiting in line but you get the goods the same day as when you purchased them.

On the final survey, automatic renewal received an average score of 2.50, while online renewal had an average score of 2.33, meaning that the 10 working group members who participated felt that these options met all criteria between somewhat and very well.

Table 3. Process methods: Working group member ratings and votes based on criteria

On a scale of 1 to 3, how well does each method meet the following criteria? ^a	Effective	Efficient (for administration)	Equitable	Low burden for drivers	Less enforcement through traffic stops	Would recommend to the Legislature
Allow automatic renewals with a credit/debit card	2.60	2.70	2.40	2.60	2.20	8 votes "yes"
Allow online renewal and in-person tab pickup	2.33	2.44	2.44	2.44	2.00	8 votes "yes"
Provide resources for people who can't afford to renew tabs	2.20	1.60	2.60	2.30	2.10	6 votes "yes"
Send renewal notices by mail with follow-up notices (brightly colored and easily recognizable)	2.00	1.89	2.11	2.33	2.00	6 votes "yes"

On a scale of 1 to 3, how well does each method meet the following criteria? ^a	Effective	Efficient (for administration)	Equitable	Low burden for drivers	Less enforcement through traffic stops	Would recommend to the Legislature
Eliminate the convenience fee for renewing with a credit/debit card	1.67	2.00	2.11	2.44	1.56	4 votes "yes"

^a Ratings are based on the average score of 10 participating entities (out of 16), where 1=not very well, 2=somewhat well, and 3=very well.

The other three "process improvement" methods ranked lower; however, existing research from the environmental scan shows that renewal notices can be helpful in increasing registration compliance.

In 2014, the Wisconsin Department of Transportation (WisDOT) and the Federal Highway Association conducted "a study of registration compliance for automobiles and light trucks, an investigation into reasons for noncompliance, and the development of a list of possible changes to the vehicle registration process that might improve compliance" (Schoech & Schoenherr, 2014, p. 1). The study was conducted by taking photographic images of license plates in eight Wisconsin counties (N=18,546 automobiles and light trucks) and then matching those images to records in a WisDOT database.

Overall, the study found that a very small proportion (2 percent, or 391 vehicles) were noncompliant in their registration. After sending a reminder email to the study sample, this proportion decreased to .7 percent (or 127 vehicles). When noncompliant vehicle owners were asked about why they were noncompliant, the most common answer by far was that they forgot (Schoech & Schoenherr, 2014, p. 1). Local experts at social service agencies were also interviewed to better understand why lower-income households might be noncompliant with vehicle registration. Experts stated that: 1) low-income households move more frequently and, therefore, may have an outdated address when a compliance notice arrives, and 2) there are significant "day-to-day life issues that require most of these households' attention," and those issues take priority over vehicle registration (Schoech & Schoenherr, 2014, p. 2).

Overall, the Wisconsin study recommended three process improvements to the registration and renewal process:

- Sending renewal notices to vehicle owners by mail, with a follow-up notice if their registration expires
- Changing from a postcard renewal notice to a notice mailed in an envelope, or changing the renewal postcard to a different color so it is more noticeable to the vehicle owner
- Eliminating convenience fees for paying fees with a credit or debit card

The advantages and disadvantages of efficiency measures, as described by participating working group members, are outlined below.

More efficient registration and renewal processes

Advantages

- These options make registration and renewal more convenient for vehicle owners.
- People would be more likely to remain in compliance.
- People are very familiar and comfortable with automatic renewal (e.g., streaming subscriptions).

Disadvantages

- Online renewals and automatic payments create a loss of revenue for the deputy registrar offices.
- Eliminating fees would mean needing to find alternate methods for finding that money.

Increased public education

Based on votes from working group members, as well as existing literature, public education is another top method for increasing registration compliance *without* the use of criminal penalties.

A 2012 study out of Kentucky "examined different types of registration violations and determined that aggressive education outreach was needed to inform the public of the proper vehicle registration process" (Hunsucker et al., 2012, p. 2). As a result of the study, "a website was designed and launched that detailed the significance of all drivers paying their fair share of the vehicle property tax and usage tax. The website also provided an anonymous way to report Freeroaders [the term that Kentucky uses for people who are non-compliant on motor vehicle taxes]" (Hunsucker et al., 2012, p. 2). While anonymous reporting was one of the *least* popular ideas among participating working group members, public education generally met the criteria for evaluation, especially low burden on motor vehicle owners and effectiveness.

The most popular type of public education was a targeted campaign specifically at Deputy Register offices who conduct transactions on behalf of DVS where people get and renew their license, while the least popular option was providing educational information at a traffic stop. It should also be noted that while social media and broad media campaigns were somewhat popular, some members questioned their effectiveness, as seen in the advantages and disadvantages section below.

Table 4. Education methods: Working group member ratings and votes based on criteria

On a scale of 1 to 3, how well does each method meet the following criteria? ^a	Effective	Efficient (for administration)	Equitable	Low burden for drivers	Less enforcement through traffic stops	Would recommend to the Legislature
Create a targeted campaign at DVS locations (for when people get or renew their license)	2.22	2.33	2.33	2.56	2.00	9 votes "yes"

On a scale of 1 to 3, how well does each method meet the following criteria? ^a	Effective	Efficient (for administration)	Equitable	Low burden for drivers	Less enforcement through traffic stops	Would recommend to the Legislature
Increase public education through social media	2.11	2.11	2.00	2.44	1.78	8 votes "yes"
Increase public education through a broad media campaign	2.22	1.89	2.11	2.22	1.89	5 votes "yes"
Law enforcement provides educational information during traffic stop	2.11	2.33	1.56	2.33	1.44	5 votes "yes"

^a Ratings are based on the average score of 10 participating entities (out of 16), where 1=not very well, 2=somewhat well, and 3=very well.

The advantages and disadvantages of education-related measures, as described by participating working group members, are outlined below:

Increased public education

Advantages

- It would remind people to pay fees and taxes; i.e., jog their memories.
- It would educate people on new and changing laws.
- Social media is widely used by the population.

Disadvantages

 Ultimately, social media may not make a substantial difference.

Automatic License Plate Readers

One of the highest-rated options, based on the evaluation criteria, was Automatic License Plate Readers, or ALPRs. An article from the environmental scan describes this technology as follows:

Automated enforcement refers to the use of data from automated technologies such as red-light cameras, speed enforcement cameras, and electronic tolling through the use of transponders or license plate readers, to ensure compliance or otherwise assess penalties without personal contact with law enforcement officials. Technologies such as automated license plate readers (ALPRs), U.S. Department of Transportation (U.S. DOT) number readers, and weigh-in-motion scales are interfaced with databases that link real-time vehicle data to federal and state credential and safety information (Forlines et al., 2019, p. 1).

While existing literature discusses the potential for improved efficiency and reduced law enforcement stops, it also cautions against infringing on personal privacy. One article—which discusses ALPRs and the differences in privacy policies between the United States and the United Kingdom—concludes with this statement: "Given the significant privacy concerns raised with the widespread adoption of ALPRs, it is imperative to craft comprehensive policies that safeguard individual privacy" (Wesner &

Blevins, 2021, pp. 155-156). The article goes on to suggest asking the following questions related to ALPR legislation and implementation:

- 1. Who needs the data, and how is that need demonstrated?
- 2. How is transparency obtained and communicated?
- 3. How is accountability ensured?
- 4. For how long can ALPR images be stored?
- 5. Who can access ALPR data?
- 6. How is ALPR data secured, and what are the consequences of inadequate security?
- 7. How should ALPR data collection and retention practices be reviewed?

Among the 10 working group members who participated in the Wilder Research survey, 7 voted to suggest ALPRs as a registration compliance option to the Legislature, and the average criteria rating was 2.31 (meaning that members felt it met the criteria a little more than "somewhat well"). ALPRs were rated highest in "effectiveness" (2.67) and lowest in "administrative efficiency" (1.89).

Table 5. ALPRs: Working group member ratings and votes based on criteria

On a scale of 1 to 3, how well does each method meet the following criteria? ^a	Effective	Efficient (for administration)	Equitable	Low burden for drivers	Less enforcement through traffic stops	Would recommend to the Legislature
Increase use of Automatic License Plate Readers, or ALPRs	2.67	1.89	2.33	2.22	2.44	7 votes "yes"

^a Ratings are based on the average score of 10 participating entities (out of 16), where 1=not very well, 2=somewhat well, and 3=very well.

The advantages and disadvantages of ALPRs, as described by participating working group members, are outlined below.

Automatic License Plate Readers, or ALPRs

Advantages

• If leveraged correctly, this tool could be effective for compliance.

- This could be a high administrative burden; there would need to be a file with expired registrations so that the system could flag those for someone at DVS (systems need to talk to each other).
- The use of ALPR technology can be seen as a means for tracking the movement of individuals. Privacy concerns may make implementation of this technology challenging.

More or different penalties tied to registration and renewal

Several of the remaining methods explored by the working group are related to penalties for noncompliance.

Of the options discussed, the most popular was implementing a fee for late renewals, with eight members voting to suggest that method to the Legislature; it also had the third highest rating for "effectiveness" of any option discussed. The working group did not delve into the specifics of what this late fee might involve, but generally thought about a "fee" as between \$10 and \$50.

Interestingly, while the three remaining methods in this category received five or six votes for suggesting them to the Legislature, they received some of the lowest overall ratings for meeting the evaluation criteria (see Table 6, as well as the full table in the Appendix).

Working group members were split with regard to eliminating criminal penalties; below are several illustrative quotes:

The revenue can be obtained without giving someone a criminal record.

I'm supportive of [civil penalties]. I don't feel we should be out there as a revenue source of the state/policing for profit. A benefit of having this in law enforcement is sometimes expired tabs can be an indicator of something else going on. The majority of people just forgot to renew their tabs. We educate them at that point. I'm supportive of this though. We'll be missing some potential crimes but this isn't a main tactic we're using. We can live with that.

I could support [moving from criminal to civil penalties] if law enforcement was still able to stop and cite for expired registration.

Avoiding criminal penalties will only increase fraud and the lack of accountability.

Table 6. Penalties: Working group member ratings and votes based on criteria

On a scale of 1 to 3, how well does each method meet the following criteria? ^a	Effective	Efficient (for administration)	Equitable	Low burden for drivers	Less enforcement through traffic stops	Would recommend to the Legislature
Apply fees for late renewals	2.56	2.22	2.22	2.00	2.22	8 votes "yes"
Shift to civil penalties rather than criminal penalties	1.80	1.70	1.80	2.00	1.90	5 votes "yes"
Consider a civil penalty for registration up to 12 months overdue and a criminal penalty for over 12 months	2.10	1.90	1.70	1.70	1.60	5 votes "yes"
Current registration is required for benefits (fishing/hunting license, state park pass, paid parking locations)	1.80	1.50	1.70	1.90	1.90	6 votes "yes"

^a Ratings are based on the average score of 10 participating entities (out of 16), where 1=not very well, 2=somewhat well, and 3=very well.

The advantages and disadvantages of these methods, as described by participating working group members, are outlined below.

Penalties tied to registration and renewal

Late renewal fees

Advantages

- It creates financial incentive to renew registration.
- It is a straight-forward, relatively simple concept with clear cause and effect.

Shift to civil penalties

Advantages

- Expired tabs are not a public safety issue.
- It would increase equity without compromising revenue.
- It minimizes "policing for profit."

Compliance required for benefits

Advantages

- This is minimally invasive for vehicle owners.
- It is easy for vehicle owners to understand the connection between registration and benefits.
- This could be effective in tandem with other solutions.

Disadvantages

- It is punitive and would compound economic burden for marginalized groups.
- It would require protections for someone selling a vehicle so that they could avoid accruing late fees if the buyer is noncompliant.

Disadvantages

- There is uncertainty around where civil penalties would be processed/monitored.
- There is uncertainty around whether a shift to civil penalties would mean that law enforcement is no longer able to make stops for expired tabs.
- There are concerns about fraud and the lack of accountability for drivers.

- It would impact a relatively small number of vehicle owners.
- It creates an increased burden on businesses, such as those that issue fishing licenses.
- If someone owns multiple vehicles and only one is noncompliant, it would become complicated.

Search newly issued driver's licenses for people who have moved from out of state

This method, which comes from an article found in the environmental scan, falls squarely in the middle of all options presented. Five members said that they would recommend it to the Legislature, and it received a rating of 2.0, meaning it would fit all criteria "somewhat well."

The 2012 study that recommends this option comes from Kentucky and was focused on exploring "new" technologies and practices that might help improve compliance with motor vehicle property and usage tax. The article states: "Another example of a new technique [in 2012] is to examine newly issued Kentucky driver's licenses for people who come from an out-of-state address and check for new motor vehicle registrations in those persons' hands" (Hunsucker et al., 2012, p. 7).

Ultimately, researchers used existing databases to generate a monthly report that would "pull all of the new driver's licenses issued by a county for the month that were coded as being a new entrant from another state" (Hunsucker et al., 2012, p. 12). To connect the two pieces of information—new driver's licenses and compliant registration—someone had to review the monthly reports, cross-check the information in the state's Automated Vehicle Information System and manually flag any issues for investigation.

People who were noncompliant then got a notification letter that "described registration requirements in Kentucky, the associated taxes and fees owed, and request compliance. Subsequent reports would then be searched to determine if the person registered their vehicle" (Hunsucker et al., 2012, p. 12). Researchers stated that their early efforts were successful, but that the study period was too short to fully test the idea. This method also required a lot of staff time to manually cross-check database reports.

Table 7. Examine new licenses: Working group member ratings and votes based on criteria

On a scale of 1 to 3, how well does each method meet the following criteria? ^a	Effective	Efficient (for administration)	Equitable	Low burden for drivers	Less enforcement through traffic stops	Would recommend to the Legislature
Examine newly issued driver's licenses for people who have moved to Minnesota from out of state	1.78	1.78	2.11	2.11	2.22	5 votes "yes"

^a Ratings are based on the average score of 10 participating entities (out of 16), where 1=not very well, 2=somewhat well, and 3=very well.

Less popular methods explored

Several of the methods explored by the working group ranked fairly low in terms of suggesting them to the Legislature:

- Comparing vehicle insurance databases with registered vehicles
- Increasing the use of Electronic Vehicle Registration (EVR) or other Radio Frequency Identification (RFID) systems that can identify and track vehicles for expired registration
- Supplemental revenue capture with road usage charging (RUC) or mileage-based user fees (MBUF), such as tolls
- Reporting other drivers who have expired tabs (such as Kentucky's "Freddie Freeroader" program)
- Searching large parking lots—businesses (especially those that lease cars), airports, car dealers, universities—and looking for vehicles registered in other states

Each of these methods had three or fewer members voting to recommend them to the Legislature, and they all had low ratings based on the criteria (see Table 8). Members generally felt that these methods were not worth the intensive time and cost they would take to implement.

Table 8. Miscellaneous methods: Working group member ratings and votes based on criteria

On a scale of 1 to 3, how well does each method meet the following criteria? ^a	Effective	Efficient (for administration)	Equitable	Low burden for drivers	Less enforcement through traffic stops	Would recommend to the Legislature
Compare vehicle insurance database to registered vehicles	1.89	1.33	2.11	2.11	2.00	3 votes "yes"
EVR, or other Radio Frequency Identification (RFID) systems	2.00	1.56	1.33	1.67	2.00	2 votes "yes"
Supplemental revenue capture with road use charging or mileage-based user fees	1.67	1.33	1.67	1.33	1.89	1 vote "yes"
People can report a vehicle driving with expired tabs	1.22	1.44	1.22	1.50	1.89	1 vote "yes"
Search large parking lots for vehicles registered in other states	1.00	1.00	1.11	1.44	1.89	0 votes "yes"

^a Ratings are based on the average score of 10 participating entities (out of 16), where 1=not very well, 2=somewhat well, and 3=very well.

Conclusions

Expired registrations are not a priority of law enforcement. It can be a reason for a stop, but it's not something that cops use on a regular basis as far as tactics. I think that rank and file cops don't want to be in the business of enforcing rules for the state to drive revenue. From the cops' perspective, if we can have a better system for all, we're here to help educate people on where they can go or answer questions. – Working Group Member

Since beginning its work in August 2024, the Motor Vehicle Registration Compliance Working Group looked at a range of compliance-enforcement methods that go beyond law enforcement and criminal penalties. Working group members discussed the importance of holding drivers accountable for vehicle ownership and registration compliance, but also making the process efficient and easy to remember and understand.

Based on input from working group members, as well as the literature from the environmental scan, there are several conclusions that the Legislature should consider in moving this work forward.

- 1. The literature related to increasing compliance points to the need for multiple approaches. Wilder found limited existing research specifically related to registration compliance, but did find several articles focused on increasing compliance with traffic laws, such as wearing seat belts and obeying speed limits. A common theme throughout this research is that multiple approaches are needed to increase compliance with the law. It is also important to know who is noncompliant and why.
- 2. Working group members were most supportive of the Legislature considering a targeted education campaign at DVS locations. Of all options explored, a "targeted campaign at DVS locations" received the highest number of votes in support of the Legislature considering this option. Increased education, especially around *why* registration compliance is important (e.g., what is funded with those dollars), is appealing partly because it would be low-burden for drivers, as well as equitable and administratively efficient. Studies reviewed in the environmental scan also recommend public education as a way of increasing registration compliance.
- 3. Most members were also interested in practices that would increase efficiency of the registration process. Being able to renew tabs automatically with a credit card or renewing them online with in-person pickup were popular methods of increasing compliance, according to working group members. Both options would reduce the burden on drivers and allow people to remain in compliance even if they forget to renew on their own. As seen in the study from Wisconsin, when noncompliant vehicle owners were asked about why they were noncompliant, the most common answer by far was that they forgot (Schoech & Schoenherr, 2014, p. 1).
- 4. There is support for Automatic License Plate Readers in increasing registration compliance. Many working group members were supportive of the Legislature exploring Automatic License Plate Readers to help increase registration compliance. As with any surveillance technology, however, there are concerns about balancing its potential effectiveness with protecting Minnesotans' privacy. Several articles from the environmental scan cautioned about the need to thoroughly outline methods for data collection, management, and storage. It is also important to recognize that this technology has the potential to disproportionately impact communities of color if not implemented carefully.

- **5.** The article from UCLA's School of Law talks about racial biases easily being transferred from one system of enforcement to another, especially surveillance:
 - The risk that automation—like traditional traffic enforcement—will be employed disproportionately in the most politically vulnerable communities remains high. Therefore, even though automated enforcement methods create the possibility of reducing racialized policing by eliminating officer discretion in assessing tickets, they can exacerbate the extent to which traffic enforcement is made a tool of financial extraction from communities of color (Colgan, 2023, p. 943).
- 6. Working group members were split on the idea of completely eliminating criminal penalties for noncompliant registration. The first duty outlined in statute for this working group was to "identify and evaluate potential methods for enforcement of motor vehicle registration and registration tax payment requirements that would replace enforcement through the use of criminal penalties" (Minnesota Statutes 2024, H.F. 5216, Chapter 123). Half of the working group members who took the final survey (5 out of 10) said they would recommend that the Legislature consider shifting from criminal to civil penalties for noncompliant registration. Members who were opposed to this idea argued that criminal penalties are a clear incentive for drivers to renew registration on time, while those against criminal penalties argued that expired tabs are not a public safety issue and that civil penalties would increase equity without compromising revenue. Given the divisiveness of this topic, it is important for the Legislature to continually explore the data and information coming out of jurisdictions that are making changes.
- 7. A cost-benefit analysis of each method would help assess their potential impact on criteria, especially equity. Because of the complexity and nuance involved with each proposed method, as well as the evaluation criteria—effectiveness, administrative efficiencies, equity, burden on motor vehicle owners, and substantial elimination of vehicle registration enforcement through traffic stops performed by peace officers—it would be beneficial to conduct a cost-benefit analysis ahead of any large-scale changes. Implementing some of the methods proposed could have broad ripple effects and it is difficult to say at this stage whether their investment would be worth the payoff of increased registration compliance. For any method that is pursued, it will also be important for Minnesota to look carefully at those jurisdictions that have already implemented changes to learn what has worked and what has not.

Appendix

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Working group members

The following table lists the members of the working group and their affiliate entity.

Table A1. Working group members

Represented entities (per legislative statute)	Member name	Member position
Association of Minnesota Counties	Wayne Johnson	Otter Tail County Commissioner
American Automobile Association, Minnesota	Ken Mohr	Vice President of Operations
Center for Transportation Studies at the University of Minnesota	Frank Douma	Director of State & Local Policy and Outreach, Institute for Urban and Regional Infrastructure Finance
Deputy Registrar Business Owners Association	Jared O'Reilly	Board of Directors
League of Minnesota Cities	John Mulder	City Administrator
Minnesota Automobile Dealers Association	Scott Lambert	President
Minnesota Chiefs of Police Association	Jeff Potts	Executive Director
Minnesota Department of Public Safety, Driver and Vehicle Services	Greg Loper *Chair	Vehicle Services Program Director
Minnesota Department of Revenue	Dan O'Rourke	Supervisor, Individual Income Tax and Withholding
	Dan Spangenberg	Revenue Tax Supervisor
	Diane Nelmark	Revenue Tax Collection Officer
	Mike Wakefield	State Program Administrator Coordinator
	Sara Westly	Director, Collection Division
	Sarah Bronson	Assistant Commissioner for Individual Taxes
Minnesota Department of Transportation	Josh Knatterud- Hubinger	Chief Financial Officer

Represented entities (per legislative statute)	Member name	Member position
Minnesota Deputy Registrars Association	Jeff Lenarz	President
Minnesota Police and Peace Officers Association	Brian Peters	Executive Director
Minnesota Sheriffs Association	Joseph Leko	Dakota County Sheriff
Minnesota State Patrol	Jason Bartell	Captain
Minnesota Transportation Alliance	Margaret Donahoe	Executive Director
Tribal Governments	Wendy Spry	Tribal Relations Director, Department of Corrections

Data collection methods

Wilder Research undertook a variety of methods and processes to collect data and develop this legislative report. Wilder began the process by gathering context on the working group's progress through a review of the meeting minutes and presentations from convenings on August 15, 2024, September 18, 2024, and October 16, 2024. Based on these learnings, Wilder developed a data collection tool and invited all working group members to complete a survey or 30 to 60-minute interview with a Wilder staff member. Five interviews and nine surveys were completed (14 out of 16 entities). The following prompts were included in the survey and interview protocol:

- Discuss advantages and disadvantages and rank from one to five the support of 10 proposed methods discussed in previous working group meetings.
- Provide any additional methods they would like the working group to consider.
- Define each of the criteria outlined in the legislative mandate in the context of the working group.
- Indicate top three proposed methods assuming resources are not an issue.
- Indicate support of implementing top three methods versus keeping the process the same and discuss reasoning.

Wilder Research librarians conducted an environmental scan of journals, reports, and articles to identify additional methods of enforcement and payment collection for motor vehicle registration and taxes beyond law enforcement in other states and jurisdictions. Wilder staff reviewed 37 pieces of literature pulled from the environmental scan and resources referenced in presentations to the working group and identified eight methods to bring to the working group to consider.

Wilder joined the final working group meeting on November 20, 2024, and facilitated discussions on each proposed method and criteria definitions. Methods highlighted included the 10 options originally included in the initial surveys and interviews, as well as eight options from the environmental scan and five options suggested by working group members during the data collection process. See meeting minutes for more details. Following the meeting, Wilder invited working group members to complete a final online survey, in which respondents were asked to rank each of the 23 proposed methods from one to three based on how well it meets each criteria, as well as to indicate whether or not they would recommend the Legislature consider each option.

Table A2. All proposed methods: Working group member ratings and votes based on criteria

On a scale of 1 to 3, how well does each method meet the following criteria? ^a	Effective	Efficient (for administration)	Equitable	Low burden for drivers	Less enforcement through traffic stops	Total average rating	Would recommend to the Legislature ^b
Legislative statute							
Retention of license plates with a vehicle following a change of vehicle ownership	2.44	2.22	2.33	1.89	1.89	2.16	7 votes "yes"
Revenue recapture	1.90	1.50	1.50	1.90	2.10	1.78	5 votes "yes"
Alignment with individual income taxes	1.90	1.40	1.70	1.90	2.00	1.78	5 votes "yes"
Working group or environmental scan							
Allow automatic renewals with a credit/debit card	2.60	2.70	2.40	2.60	2.20	2.50	8 votes "yes"
Allow online renewal and in-person tab pickup	2.33	2.44	2.44	2.44	2.00	2.33	8 votes "yes"
Increase use of Automatic License Plate Readers (ALPRs)	2.67	1.89	2.33	2.22	2.44	2.31	7 votes "yes"
Create a targeted campaign at DVS locations (for when people get or renew their license)	2.22	2.33	2.33	2.56	2.00	2.29	9 votes "yes"
Apply fees for late renewals	2.56	2.22	2.22	2.00	2.22	2.24	8 votes "yes"
Provide resources for people who can't afford to renew tabs	2.20	1.60	2.60	2.30	2.10	2.16	6 votes "yes"
Increase public education through social media	2.11	2.11	2.00	2.44	1.78	2.09	8 votes "yes"
Send renewal notices by mail with follow-up notices (brightly colored and easily recognizable)	2.00	1.89	2.11	2.33	2.00	2.07	6 votes "yes"
Increase public education through a broad media campaign	2.22	1.89	2.11	2.22	1.89	2.07	5 votes "yes"

On a scale of 1 to 3, how well does each method meet the following criteria? ^a	Effective	Efficient (for administration)	Equitable	Low burden for drivers	Less enforcement through traffic stops	Total average rating	Would recommend to the Legislature ^b
Examine newly-issued driver's licenses for people who have moved to Minnesota from out of state	1.78	1.78	2.11	2.11	2.22	2.00	5 votes "yes"
Working group or environmental scan							
Law enforcement provides educational information during traffic stop	2.11	2.33	1.56	2.33	1.44	1.96	5 votes "yes"
Eliminate the convenience fee for renewing with a credit/debit card	1.67	2.00	2.11	2.44	1.56	1.96	4 votes "yes"
Compare vehicle insurance database to registered vehicles	1.89	1.33	2.11	2.11	2.00	1.89	4 votes "yes"
Shift to civil penalties rather than criminal penalties	1.80	1.70	1.80	2.00	1.90	1.84	5 votes "yes"
Consider a civil penalty for registration up to 12 months overdue and a criminal penalty for over 12 months	2.10	1.90	1.70	1.70	1.60	1.80	5 votes "yes"
Current registration is required for benefits (fishing/hunting license, state park pass, paid parking locations)	1.80	1.50	1.70	1.90	1.90	1.76	6 votes "yes"
EVR or other RFID systems	2.00	1.56	1.33	1.67	2.00	1.71	2 votes "yes"
Supplemental revenue capture with road use charging or mileage-based user fees	1.67	1.33	1.67	1.33	1.89	1.58	1 vote "yes"
People can report a vehicle driving with expired tabs	1.22	1.44	1.22	1.50	1.89	1.46	1 vote "yes"
Search large parking lots for vehicles registered in other states	1.00	1.00	1.11	1.44	1.89	1.29	0 votes "yes"

^a Ratings are based on the average score of 10 participating entities (out of 16), where 1=not very well, 2=somewhat well, and 3=very well.

^b 10 entities participated in the survey from Wilder Research. Only the "yes" votes are shown to illustrate support for each item. A non-yes answer means that either someone voted "no" or skipped the question.