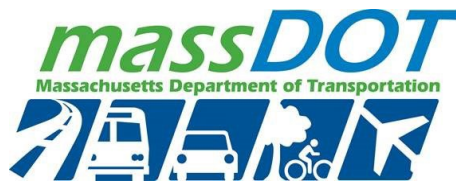


RMV Electronic Vehicle Registration (EVR) Audit

MassDOT Audit Operations Report

July 9, 2025



Executive Summary

To: Director Richard Dimino, Chairman, Director Timothy King,
Director Eric Batista

From: Jim Logan, Director of MassDOT Audit Operations

Date: July 9, 2025

RE: RMV Electronic Vehicle Registration (EVR) Audit

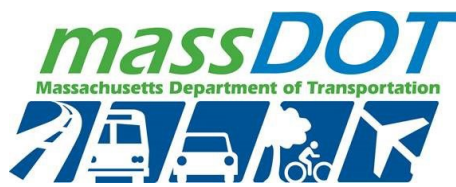
Audit Operations (AO) completed a performance audit of the Registry of Motor Vehicle (RMV) Electronic Vehicle Registration (EVR) Unit covering the period of January 1, 2022, through December 31, 2022. The audit focused on evaluating internal controls, policies, standard operating procedures, and reporting for vehicle registrations at Permit Holders¹ locations.

Audit fieldwork and testing included walkthrough meetings with personnel, as well as observations of the EVR process at applicable Permit Holder locations, and random transaction sampling. The audit was conducted from January 2023, through July 2023.

The purpose of this audit was to provide an independent and objective assessment of the EVR processes to determine whether they are operating effectively, efficiently, and in compliance with applicable policies, procedures, regulations, and best practices. The primary objectives of the audit focused on determining whether:

- Documented procedures are in place to ensure oversight for reviewing and completing the registration and transaction process. Transactions are processed in accordance with the RMV's policies

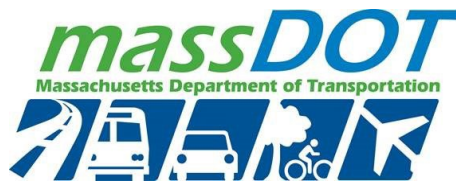
¹ A "905 Permit Holder" refers to a business or entity authorized by the Registry of Motor Vehicles (RMV) to participate in the Electronic Vehicle Registration (EVR) Program. This program allows approved permit holders—such as car dealerships, insurance agencies, and fleet managers—to process vehicle registration and title transactions electronically, without needing to visit an RMV service center.



and procedures.

- Effective controls are in place to ensure that all Permit Holders understand and adhere to regulations for processing registration and title transactions. Data is entered accurately, and changes are made upon customer's request.
- System access controls are in place and are appropriate for the Permit Holders' level of responsibility through the EVR program.
- Permit Holders are observing established procedures to ensure that transactions are processed in a secure area where unauthorized users do not have access. A detailed written security plan is submitted to the RMV.
- Permit Holders provide adequate supervision and quality reviews to ensure data integrity and verify that the original transaction documents and copies are stored in a safe and secure area.
- Permit Holders have at least two or three EVR authorized employees who process at least one transaction every 30 days. Permit Holders process at least ten new plate transactions or transfers per month.
- License plates and decals that are electronically tracked for receipt and issuance are reviewed. Physical security of license plates and decals is validated.
- Inventory of the license plates on hand from the service provider's system is matched to ATLAS, as well as the plates and decals on hand compared with the inventory. Any discrepancies between the physical inventory and the printed inventory are identified, duplicate or damaged plates are disposed of. All ATLAS inquiries are performed for valid business purposes.
- Review EVR audit frequency to determine if it is in line with the 120-day requirement outlined policy.

This audit identified seven (7) issues, out of which two (2) were rated as



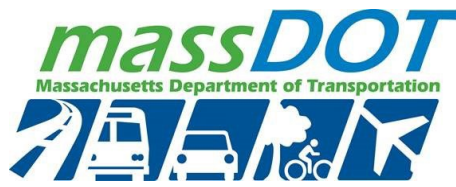
high risk, four as medium risk (4) and one (1) low risk. The two (2) high risk findings related to:

1. EVR Management has imposed a recommended audit frequency of one audit every 120 days for all Permit Holders to ensure the quality of data and information that is entered into the EVR process. However, the EVR audit team has been unable to meet this recommendation. Due to the increase in Permit Holders, the EVR's audit team is not sufficiently resourced to conduct one audit in a 120-day period. The EVR program has grown significantly, and the EVR audit process should be reengineered to align with the one onsite audit every 120 days.
2. The RMV has contracted with a third-party service provider, the Massachusetts Fleet Processing Center Inc. (MFPCI) based at Logan Airport, to process high volumes of EVR transactions for fleet operations. At time of audit, EVR had not examined the MFPCI, and the rental companies located within the MFPCI, during 2022 and 2023. AO was informed by EVR Management that their focus has been on the expansion of the EVR Program and the transition to ATLAS. After completion of the audit, EVR Management confirmed an onsite audit was completed on 3/7/24.

All audit findings have been discussed with management and corrective action plans have been identified. We would like to thank the representatives of the RMV EVR Unit for their support and cooperation throughout our audit.

Please contact me if you have any questions or concerns at (857) 368-9777 or James.Logan@dot.state.ma.us.

CC:



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I. Introduction

Audit Operations (AO) completed a performance audit of the Registry of Motor Vehicle (RMV) Electronic Vehicle Registration (EVR) Unit from January 2023, through July 2023. The audit was conducted in accordance with Generally Accepted Government Auditing Standards (GAGAS). The audit focused on evaluating internal controls, policies, standard operating procedures, and reporting related to the EVR oversight and monitoring of the vehicle registrations at Permit Holders locations.

Audit fieldwork and testing included walkthrough meetings with management and personnel, observation of the EVR process at applicable Permit Holder locations, and random transaction sampling.

II. Background

Overview

Chapter 90 of the Massachusetts General Laws provides the statutory guidelines governing the RMV and Title 540 of the Code of Massachusetts Regulations (CMR) provides regulatory responsibilities for the RMV. The day-to-day operations of the RMV are overseen by the Registrar of Motor Vehicles.

One of the main responsibilities of the RMV is to maintain oversight over the vehicle registration program, which includes, but is not limited to, registering vehicles and issue plates and decals, transfer plates between vehicles, and cancelling plates. Vehicles can be registered at RMV Service Center locations, or through the EVR program at a registered Permit Holders location. A "Permit Holder" is a business or entity that is authorized by the RMV to participate in the EVR Program. The RMV provides Permit Holders with access to the EVR system, via Third-Party Service Providers, to process registration and title transactions using electronic messages. There are four service providers:

Boston Software, Computerized Vehicle Registration (CVR), Decision Dynamics, LLC (DDI), and Dealertrack Registration and Titling Solutions Inc. Permit Holders include car dealers, insurance agents, fleets, and insurance companies that meet the EVR program's volume requirements. Permit Holders may perform the following registry functions through EVR:

- process registrations and renewals;
- issue new plates and decals;
- transfer plates between vehicles;
- collect title information;
- process certain renewals;
- vehicle registrations;
- plate cancellations; and
- change a customer's address in the RMV database.

Please note that both the service providers and EVR end users are required to sign permits. At the time of the audit, there were approximately 905 Permit Holders using the traditional EVR product group, accounting for approximately 50% of Massachusetts registration and title transactions annually.

EVR Program

The EVR Program is comprised of three separate programs:

- 1) EVR Traditional,
- 2) EVR Lite,
- 3) EVR Limited.

EVR Traditional and EVR Lite are similar programs that are available to any of the participating Service Providers. An EVR Limited Program is designed specifically for insurance agents and their current software provider, Boston Software. The primary difference between EVR Lite and Traditional EVR is plate inventory and issuance. In EVR Lite, the Permit Holder always issues a Temporary Plate. In Traditional EVR, the Permit Holder issues physical plates with the option of issuing a Temporary Plate for the plates they do not have in stock. In both programs, the Permit Holder has a stock of plate sleeves, while only the Traditional EVR Permit Holders have a stock of plates and decals. More specific requirements are:

The EVR Traditional and EVR Lite programs must complete the following requirements:

- The Permit Holders are required to execute a permit with the RMV and are associated with the transactions they perform in ATLAS.
- Permit Holders end users must complete a background check and a combined service provider/RMV new user training requirement before they can process transactions.

The EVR Traditional and EVR Lite programs have transaction minimums including:

- To be approved for EVR Lite, the Permit Holder must prove they process ten or more new registration and/or registration transfer transactions per month for a consecutive two-month period.

- If the Permit Holder processes 35 or more new registration and/or registration transfer transactions per month for a consecutive two-month period, they must enroll in the Traditional EVR program.
- If a Permit Holder processes between 25–35 new registration and/or registration transfer transactions per month for a consecutive two-month period, they may be enrolled in either program subject to RMV approval.

EVR Traditional Program

The following items are included in the EVR Traditional Program:

- The Permit Holder prints all registration documents and RMV fee receipts for the customer.
- The Permit Holder must have an inventory of plates and decals. The plate inventory is periodically reconciled with the RMV.
- This program allows temporary plate issuance for authorized plates that are not in the Permit Holder's plate inventory. The customer can print the temporary plate and registration directly from the myRMV Online Service Center.
- The Permit Holder can print the renewal and duplicate registrations and provide them to the customer along with an expiration decal (if required).

EVR Lite Program

The following items are included in the EVR Lite Program:

- The Permit Holder prints the registration documents and the RMV fee Receipts and provides to the customer. The customer can print the temporary plate and registration from the myRMV Online Service Center.
- Temporary plates are issued for every transaction that requires plate

issuance.

- The Permit Holder prints renewal registrations and provides to the customer.
- The RMV mails the renewed registration and associated expiration decal directly to the registrant/lessee.

EVR Limited Program

The EVR Limited Program was designed specifically for insurance agents and their current software provider, Boston Software. The features/limitations of this program are outlined below.

- The participating agents are not required to sign a permit and become Permit Holders. In ATLAS, all EVR limited transactions are credited to the service provider, who in turn is required to track the agency and agent that performed the transaction.
- The transactions available through EVR limited are registration renewals, registration reinstatements, and the Get Ready registration and title applications (RTA forms).
- There is no training required to perform these transactions.
- There is no inventory of any kind.
- There are no document scanning requirements.
- There is no issuance of plates.
- The service provider collects fees directly from the customer.
- The fees are reconciled with the RMV in the same manner as EVR Traditional and EVR Lite programs.
- The agent prints the renewal registration and associated EVR decal receipt and provides to the customer. The permanent certificate of registration document is printed and mailed to the customer along with the plate decal.

RMV EVR Oversight & Audit Program

RMV is responsible for maintaining oversight of the EVR Program to ensure legal compliance, protect consumers from fraud, and uphold the accuracy and integrity of vehicle records. This oversight supports efficient service delivery, safeguards sensitive data, and fosters public trust in the registration process. With the RMV, the EVR Team is responsible for maintaining oversight of the EVR program, Policy Holders and Third-Party Service providers. Oversight, including providing training Policy Holders, monitoring key program trends and ongoing audits of Policy Holders. The EVR team leverages reporting in ATLAS to help with their ongoing monitoring and oversight. Based on Management recommendations, Audit of Policy Holders is completed every 120 days by the RMV's audit team, under the RMV Compliance Officer. The purpose of the audit process is to ensure the quality of data and information that is entered into the EVR process by Policy Holders.

III. Scope and Objectives

The purpose of this audit was to provide an independent and objective assessment of the EVR processes to determine whether they are operating effectively, efficiently, and in compliance with applicable policies, procedures, regulations, and best practices. Overall, the audit focused on determining whether the EVR Unit has provided the necessary governance, oversight and reviews to validate that EVR Permit Holders are maintaining the following standards:

- System access controls are in place and are appropriate for the Permit Holders' level of responsibility through the EVR program.
- Documented procedures are in place to ensure oversight for reviewing and completing the registration and transaction process. Transactions are processed following the RMV's policies and procedures.
- Effective controls are in place to ensure all Permit Holders understand

and adhere to regulations for processing registration and title transactions. Data is entered accurately, and changes are made upon customer's request.

- Permit Holders are observing procedures to ensure that transactions are processed in a secure area where unauthorized users do not have access. A detailed written security plan is submitted to the RMV.
- Permit Holders provide adequate supervision and quality review to ensure data integrity and verify that the original transaction documents and copies are stored in a safe and secure area.
- Permit Holders have at least two or three EVR authorized employees who process at least one transaction every 30 days. In addition, Permit Holders must process at least ten new plate transactions or transfers per month.
- Reviewing license plates and decals that are electronically tracked for receipt and issuance. Validating the physical security of license plates and decals.
- Matching the inventory of the license plates on hand from the service provider's system to ATLAS and comparing the plates and decals on hand with the inventory. Any discrepancies between the physical inventory and the printed inventory should be identified and duplicate or damaged plates should be disposed of. All ATLAS inquiries are performed for valid business purposes.

Audit fieldwork and testing included walkthrough meetings with management and personnel, observation of the EVR process at applicable Permit Holder locations, and random transaction sampling. The audit methodology includes sufficient, competent, and relevant evidence that was obtained to provide a reasonable basis for any findings and conclusions. Sufficient in that, it encompassed applicable processes, competent in that, evidence was obtained through direct physical examination, observation, computation, and

inspection relevant in that it has a logical relationship with, and importance to, the issue(s) being addressed.

The audit sampling was for the period from January 1, 2022, through December 31, 2022.

IV. Overall Assessment

Based on the audit results and testing, AO concludes that internal controls covering the EVR program are in place and function effectively. However, we have identified seven (7) issues, two (2) are rated as high risk, four (4) are rated as medium risk, and one (1) is rated as low risk. We recommend internal control improvements as attached in the detailed audit findings.

Risk Rating Scale

Risk Rating	Action to be Taken	Issues
H (High)	Close supervisory attention is required.	2
M (Medium)	The audited area requires increased attention.	4
L (Low)	Issues can be corrected within the normal course of business.	1

Issue	Risk	Recommendation	Management Response
EVR Audit Process Redesign			
<p>The RMV's audit team, under the RMV Compliance Officer, maintains a process to periodically conduct onsite audits of EVR Permit Holders. EVR Management recommendation is that one onsite audit should be completed every 120 days for each Permit Holder to ensure the quality of data and information that is entered into the EVR process.</p> <p>The AO Team observed and was informed by RMV</p>	H	<p>Reengineer and document the Permit Holder audit process to account for the increase in the EVR audits needed.</p> <p>EVR will meet their own management recommended standards for audit presence by increasing the number of audits done onsite.</p>	<p>Responsible Parties:</p> <p>RMV Senior Management</p> <p>Action:</p> <p>Given the growth of the EVR program, the RMV will review the entire process and determine what the program requires and how best to allocate resources. In addition, the EVR unit will implement a plan to utilize Diligent software to allow for remote auditing and identification of high-risk locations, thereby limiting the number of times an in-person audit is conducted.</p>

management that the RMV has not been able to maintain alignment with the 120 day recommendation. Through discussions with RMV management, AO was informed that that the EVR program has grown significantly on a yearly basis. This growth has resulted in EVR audit team being unable to keep up with the volume of EVR Permit Holders transactions, which could potentially lead to the following consequences such as RMV customer service complaints,

Plan with current staff is as follows:

- Conduct 1 onsite audit and 1 remote audit annually per Permit Holder.
- For the top 10% of Permit Holders based on risk, conduct 1 additional onsite audit if needed.

We propose hiring 2 more compliance officers for a total of 7. With 7 compliance officers plan will be as follows:

- Conduct 1 onsite audit and 2 remote audits annually per Permit Holder.
- For the top 20% Permit Holders based on risk,

financial implications, and reputational damage.			<p>conduct 1 additional onsite audit if needed.</p> <p>Implementation Date: Completed by: 3/31/2025</p>
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Issue	Risk	Recommendation	Management Response
MFPCI Adherence to Policies and Procedures, and Onsite Audits at Logan Airport			

<p>The MFPCI (Massachusetts Fleet Processing Center Inc.) is an organization of large rental fleet owners who electronically register and title vehicles.</p> <p>The contract between MFPCI and the RMV establishes a procedure where MFPCI functions as an agent on behalf of the RMV [with limited authority] to register and title vehicles for MFPCI customers only.</p> <p>To ensure that MFPCI maintains alignment with the contract and their services meet the agreed</p>	<p>H</p>	<p>1) Ensure that the RMV is conducting an annual examination of the reporting and recording of data through the ATLAS system to certify policies and procedures are being adhered to by the MFPCI.</p> <p>2) Assign a Compliance Officer to conduct an audit of rental companies' fleet vehicles at Logan Airport. In addition, reporting should be made available to EVR Compliance Officers by the on-site Fleet Supervisors to determine any inconsistencies in the processing and paperwork</p>	<p>Responsible Parties:</p> <p>EVR Registration Management</p> <p>Action:</p> <p>A two phased action plan will be followed.</p> <p>Phase 1: The RMV will conduct an onsite visit of MFPCI at Logan airport to do an onsite security audit, gathering information to be used in the development of an audit protocol, and to conduct a license plate inventory validation.</p> <p>Phase 2: The RMV will work to create an audit protocol for MFPCI, incorporating the Diligent software tools. RMV's</p>
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<p>upon contract requirements, the EVR team should maintain oversight and complete ongoing audits over MFPCI. The contract outlines that the RMV has the right to inspect, examine and audit the books, records, and reports of the MFPCI relating to the ATLAS system, including plate and decal maintenance</p> <p>However, AO identified that the EVR audit team has not completed a review of the MFPCI organization, and the corresponding requirements outlined in</p>	<p>involved with daily transactions.</p>	<p>field and audit team will complete the assignment and develop, test and implement MFPCI specific protocols and audits.</p> <p>Implementation Date: Phase 1: Completed 3/15/2024 Phase 2: Completed 9/31/2024</p>
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the contract.

In addition, AO also identified that Enterprise, Hertz, and Avis locations located within the MFPCI, have not had on-site audit conducted by EVR Compliance Officers for fleet vehicles during 2022 and 2023. AO notes that these locations process their own transactions via ATLAS. As a result, they are not considered to be EVR locations.

Management explained that, over the past few years, EVR management has focused on the

expansion of the EVR program and the transition to ATLAS. Due to the increased volume, the EVR audit team had not examined MFPCI and the rental companies in 2022 and 2023.			
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Issue	Risk	Recommendation	Management Response
SQRs and Reporting			
<p>The EVR team is responsible for maintaining oversight of the EVR Program to ensure legal compliance, protect consumers from fraud, and uphold the accuracy and integrity of vehicle records. In order to maintain effective oversight, the EVR team leverages ATLAS data and reporting. However, reporting is currently limiting oversight, and over the past 3 years EVR management has initiated seven (7) Solution Request</p>	M	<p>Ensure the EVR Unit is receiving updated statistical reporting in order for management to analyze the completed data to determine if any changes to the program should be initiated. Expedite outstanding SQRs to improve reporting.</p>	<p>Responsible Parties: EVR Registration Management</p> <p>Action: SQR 24701 and SQR 24039, SQR 20405, SQR 24702, and SQR 15647 are currently in use. SQR 20561 is closed and no longer needed as the information is tracked through Salesforce.</p> <p>The EVR unit will work with management to prioritize 22703 for completion in 2025.</p>

(SQR) to help generate key reporting for the EVR Program within ATLAS

Please note: A SQR is a documented request to make a change or an improvement in ATLAS.

As of August 18, 2023, none of these requests have been completed, which has made it difficult for management to maintain oversight and generate up-to-date reporting for management to review.

The 7 SQRs are as follows:

- SQR 24039: Report for Completed EVR Onsite

Implementation Date:

SQR 24701- Completed 10/30/2023

SQR 24039- Completed 3/27/2024

SQR 20405- Completed 6/9/2024

SQR 24702- Completed 12/8/2024

SQR 15647- Completed 3/18/2024

SQR 20561- is closed as it will be tracked through Salesforce.

SQR 22703- will be completed in 2025.

<p>Audits- opened on 12/21/22.</p> <ul style="list-style-type: none"> •<u>SQR 20405</u>: Report for EVR document destruction- opened on 5/25/21. •<u>SQR 22703</u>: Have the service providers send the EVR unit the IEP name in the transaction via EVR- opened on 4/21/22. •<u>SQR 24701</u>: Add a Compliance Officer field to the attributes section of the EVR account- opened on 5/15/23. (This feature did go into production on 10/30/2023) •<u>SQR 20561</u>: Report to capture Dealer/Broker 		
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license and liability
insurance expiration dates
for the EVR
Accounts/Reporting/ATLAS
generated letter- opened
on 6/16/21.

•SQR 24702: Report of
NMVTIS holds out on EVR
transactions- opened on
5/15/23.

•SQR 15647: EVR Sales Tax
Exemption Report to
include all locations-
opened on 2/13/20.

Issue	Risk	Recommendation	Management Response
EVR Training			
<p>The EVR policy states that all Permit Holder personnel must have completed all training to ensure the EVR policy is executed properly. Further, the RMV includes specific Permit Holder duties training requirement for each key EVR staff, as stated in Form 30 (state job duty form). Lastly, in accordance with the above noted requirements, the RMV maintains critical training material for Permit Holder personnel.</p> <p>AO observed instances</p>	M	<p>Increase the number of training consultants who currently conduct training, along with a continuation of an E-Learning training feature that is being developed as a second step to personal training.</p> <p>Increased training will result in less processing errors, increased consistency, improved customer service, and continuity of staff knowledge.</p>	<p>Responsible Parties:</p> <p>EVR Registration Management and Training Department</p> <p>Action:</p> <p>This issue has been resolved. A new and dedicated EVR training staff resource has been added by the Training Department as of 12/4/2023.</p> <p>In addition, e-learning modules for EVR are in the process of being created, which will limit the number of instructor led EVR trainings. Due to staffing turnover and other issues, this is still in progress.</p>

where EVR Compliance staff, who are responsible for on-site training of Permit Holders, had to assist with administrative work in the RMV Quincy office, which kept them away from their primary training responsibilities.

Based on discussions with EVR management, with the growing number of EVR process users, there was not enough RMV staff to complete all of the required training which could result in processing errors.

We are working with the training and learning & development team to complete by 6/30/2025.

Implementation Date:

EVR Training staff resource:

Completed 12/4/2023

E-learning modules: 6/30/2025

Issue	Risk	Recommendation	Management Response
Automated EVR Tracking			
<p>EVR Compliance Officer visits to Permit Holders are a critical part of the EVR oversight process. As a result, the ability to accurately track visits and Permit Holder responses is an important part of tracking.</p> <p>AO note that All EVR data and information in the EVR Unit is tracked manually (which is not the most efficient method). Specifically, EVR tracks Compliance Officers' visits to Permit Holder locations</p>	M	<p>Discuss with senior RMV management a modification to the ATLAS system, or another system alternative, which would provide information about all outstanding issues, such as priority, status, and staff. Align audits to the highest priority risks.</p> <p>Automating EVR data and Compliance Officers' audit work will increase efficiency of the process by improving timely communications and providing an effective documentation trail of</p>	<p>Responsible Parties:</p> <p>EVR Registration Management</p> <p>Action:</p> <p>The EVR unit is actively working with IT resources to create automated audit features and tracking, utilizing the Diligent software.</p> <p>Implementation Date: Completed 11/1/2024</p>

through an Excel spreadsheet. Once an audit is completed, the Permit Holder is given three days to respond to issues identified through the audit. The three-day period is tracked manually, and any follow-up requests must be communicated through email.

There is no automatic reminder that can be sent to the Permit Holder (defined in the Background section) or EVR management informing them if any issues have not been finalized by the Permit

information.

Holder.

When a license expires it must be inspected manually, including updating the license. The EVR unit is trying to automate the system using Diligent software.

Issue	Risk	Recommendation	Management Response
Documented Procedures to Manage EVR Unit in Absence of Key Leaders			
<p>Standard Operating Procedures (SOPs) are essential for ensuring consistency, quality, and compliance across operations. SOPs reduce the risk of errors and help maintain business continuity during staff changes or unexpected disruptions.</p> <p>AO observed that the EVR Unit does not maintain written documentation regarding key management personnel and their job responsibilities. The EVR unit</p>	M	<p>Update and/or develop written policies and Standard Operating Procedures (SOPs) for an employee plan for resuming routine business operations in case of planned or unforeseen key management personnel turnover.</p>	<p>Responsible Parties: EVR Registration Management</p> <p>Action: The EVR unit is actively working to create SOPs. The SOPs have been drafted and are under active review.</p> <p>Implementation Date: Completed 6/1/2024</p>

relies heavily on experienced operations managers. These management positions require very specialized job skills and experience to quickly diagnose and correct any problems. Undocumented processes create a reliance on key personnel which may negatively impact EVR's ability to ensure the continuity of processing transactions as required, despite turnover and changes in the current personnel.

Issue	Risk	Recommendation	Management Response
EVR Hearings Process Policies			
<p>To ensure consistency, accuracy, and accountability, MassDOT should have formal policies and procedures governing third-party activities. These documents should define roles, responsibilities, performance standards, and oversight mechanisms to maintain operational integrity, safeguard independence, and ensure alignment with contractual requirements.</p> <p>Through discussions with</p>	<p>L</p>	<p>Establish a written policy for the hearing process, including an online of action steps to be taken for violations that may have occurred.</p> <p>Such a policy will help ensure immediate, appropriate customer actions are taken and will also be beneficial for training staff.</p>	<p>Responsible Parties:</p> <p>EVR Registration Management</p> <p>Action:</p> <p>The draft EVR hearing standard operating procedures have been established, drafted, and will be published internally.</p> <p>Implementation Date:</p> <p>Completed 3/12/24. Implemented along with SOP manual on 6/1/2024.</p>

Management, AO noted that there is no formal policy or procedure to maintain consistency in the hearings process for potential Permit Holder violations (i.e., forging signatures, registering vehicles without proper paperwork, etc.).

The process should include the results from the investigation of the consumer/customer complaint being documented in ATLAS. The results from the hearing process should be immediately sent to the EVR management for possible further action, including

suspension, termination, etc.

Lack of formal policies or procedures may result in hearings process inconsistencies and impacts to customer service.