

# LEGISLATIVE AUDIT COMMISSION



Management Audit  
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S  
VEHICLE EMISSIONS TESTING PROGRAM

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622 Stratton Office Building  
Springfield, Illinois 62706  
217/782-7097

**MANAGEMENT AUDIT**  
**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S**  
**VEHICLE EMISSIONS TESTING PROGRAM**  
**OCTOBER 2001**

**RECOMMENDATIONS - 10**

**Background**

In 1970, Congress enacted the Clean Air Act to improve air quality and reduce air pollution. In 1977, the Clean Air Act was amended and broadened to include an Inspection and Maintenance (I/M) program. In 1983, the U.S. EPA began formal sanctions to withhold federal highway funding from Illinois for failure to meet ozone health requirements. In response, Public Act 83-1477 created an I/M program, which began in 1986, known as the Illinois Vehicle Emissions Testing Program. Thirty-five states have an emissions testing program.

Illinois tests the emissions of certain gasoline powered vehicles that are more than four model years old. These tests are performed in Chicago and Metro-East St. Louis areas which have exceeded federal air quality standards. Vehicles are tested every two years, and vehicle owners are notified through the Secretary of State's Office of their obligation to have the vehicle tested within 90 days of receiving the notice. IEPA uses a contractor named Envirotest, and the program's total cost is approximately \$50 million per year. Motorists are not charged for the test. In calendar year 2000, Envirotest performed 1,647,995 emissions tests and 8.4% of the vehicles tested failed, mostly vehicles older than 1990.

**Summary**

The audit was conducted pursuant to Legislative Audit Commission Resolution #119, which asked the Auditor General to conduct a management audit of the Illinois Environmental Protection Agency's Vehicle Emissions Inspection Program in the Chicago metropolitan area and East St. Louis. The audit was to include specific determinations related to the following:

- IEPA monitoring of the contractor, Envirotest;
- Training of vendor's employees;
- Effectiveness of vendor's process for responding to damage complaints; and
- Comparison of tests used in Illinois with those of other states.

The audit found that contrary to either IEPA's contract with Envirotest or State statute, the contractor trains its employees, gives tests, grades tests, and certifies its employees.

## **Vehicle Emissions Testing Program**

Two-thirds of the 97 employees' training records sampled lacked some documents.

In calendar year 2000, 1,043 motorists filed damage claims and Envirotest paid 220 claims. Envirotest is responsible for receiving, recording, and deciding whether to pay damage claims. There is no appeal process set up by IEPA.

IEPA reported that motorists waited 7½ minutes on average before their test, or half the time allowed by contract. Motorists surveyed generally were satisfied with the test process and gave a rating of 4.12 out of 5.00. IEPA lacked a written policy and procedures manual for the program with Envirotest, involving a nine-year contract worth \$392 million and running through 2006. Essentially the same company has held the contract since 1986. IEPA imposed \$731,045 in liquidated damages on Envirotest in FY2000 for incorrect testing procedures.

Illinois uses the I/M 240 test on most 1981 and newer vehicles. I/M 240 is the most enhanced emissions test according to the U.S. EPA. The test is operated by placing the car on a treadmill device and it is then "driven" by a lane inspector at various speeds and loads for approximately 240 seconds (four minutes). Test equipment continually monitors and assesses the emission levels to identify clean or dirty vehicles. Pre-1981 vehicles and vehicles with full-time four-wheel drive are tested with the basic idle test. This test requires placing a probe in the exhaust while the vehicle is idling. The I/M test is used by six states, and other states use less comprehensive tests.

### **Recommendations**

**1. The IEPA Division of Vehicle Inspection and Maintenance should implement the following procedures:**

- **Monitor the training required by the contract, including reviewing the contractor's records to ensure complete and accurate records exist which demonstrate that all required training was provided.**
- **Grade the tests as required by the contract.**
- **Certify the lane inspectors as required by State law.**

**In addition, IEPA should provide its test station monitoring personnel the training that is required by federal regulations.**

**Findings:** Envirotest did not have complete training records on lane inspectors and test station managers. The auditors noted the following:

- The contractor did not track the hours of training received by managers. None of the 34 Envirotest station managers had complete documentation of training records.
- One-quarter of the lane inspectors sampled did not have complete documentation of receiving the 80 hours of required training.

## Vehicle Emissions Testing Program

- IEPA allows Envirotest to train its employees, administer the test to them, grade the test and certify its employees although the contract, State statute and federal regulations require involvement by an entity other than the contractor.
- IEPA does not provide training to its new State Inspectors on all the subjects listed in federal regulations related to vehicle emissions testing.

**IEPA Response:** Accepted. IEPA helped develop and establish one of the most comprehensive training programs in the nation for lane inspectors and lane facility managers. As part of its continuous improvement program, the IEPA implemented new procedures in April 2001 that were recommended by an internal audit of its Vehicle Inspection and Maintenance program. These procedures provide for the tracking of the essential training elements to aid IEPA State Inspectors in their verification that lane inspectors have received 40 hours of hands-on training and 40 hours of classroom training. Prior to these improvements, the State Inspectors verified the effectiveness of the training program by performing daily observations and evaluation of the actual performance of the contractors' lane inspectors and managers. These post-training observations are an important part of ensuring that the inspectors and managers are effectively trained.

Additional procedures and training are now being prepared to guide the IEPA State Inspectors in their task of confirming that training records and test grading are complete and accurate. The State Inspectors will document the training hours and review and document the computer-based grading results. The IEPA will then certify the lane inspectors.

The Quality Assurance Auditors will audit the contractor's employee training files to ensure completeness of training documentation.

The IEPA Quality Assurance Audit team is comprised of staff with extensive prior experience in the various operational aspects of the vehicle testing program. To become a member of the Quality Assurance Audit team, this program knowledge and experience are supplemented with hands-on training in the various components of the applicable federal regulations. IEPA is now developing a more formal training program and is scheduling training for the Quality Assurance Auditors for all areas covered in the federal regulations. Furthermore, since U.S. EPA does not have guidance or specific criteria regarding training in their federal regulations, we will work with U.S. EPA to develop a suitable model that fulfills U.S. EPA's expectations.

- 2. The IEPA Division of Vehicle Inspection and Maintenance should be more involved in the damage claims process to ensure that the contractor's records are accurate and that legitimate damage claims are paid promptly.**

**Findings:** Envirotest is responsible for receiving, recording, and deciding whether to pay damage claims. In calendar year 2000 Envirotest conducted approximately 1.65

## Vehicle Emissions Testing Program

million vehicle emissions tests and recorded 1,043 damage claims from motorists. Envirotest paid 220 claims for a total amount of \$74,649, for an average of \$339 per claim.

Among other states that provided information, Maryland (1,314) had the highest number of claims. Missouri had the highest damage claim rate of 15.80 per 10,000 test. Illinois was second with 6.33 per 10,000. Ohio paid the most damage claims (278) followed by Illinois.

Some claims for relatively small damages, such as a lost gas cap, can be paid by the station manager by issuing a purchase order. There were 51 purchase orders issued in calendar 2000. Envirotest has selected 34 Claim Evaluation Centers (CEC) to evaluate vehicles and provide an opinion on whether the damage was caused by the vehicle emissions test. Envirotest pays the CEC \$25 for a visual evaluation of the damage. In calendar year 2000, Envirotest directed 560 of the 1,043 motorists who filed damage claims to take their vehicle to a CEC for evaluation. Only 21 damage claims were paid after a CEC review. However, only about 20%, or 113 of the motorists directed to take their vehicle to a CEC actually did so.

IEPA receives monthly reports on damage claims, but does not review Envirotest's handling of individual claims. If Envirotest does not pay damage claims, motorists do not have any administrative recourse to a State agency even though testing is required by the State. Motorists may take their claim to binding arbitration with the Better Business Bureau or litigate in a court of law.

IEPA program managers stated that if the agency becomes involved in damage claims, the agency could become a party to litigation and the State could be held liable for damages. Because the vehicle emissions test is required by State law, it would seem that the State should be involved in actively monitoring all customer service aspects of the program, including the damage claims process. IEPA could establish procedures for reviewing damage claims to ensure that the contractor is not denying appropriate claims and to ensure that claim payments are reasonable. IEPA already had monitoring personnel at test stations who could review damage claims.

**IEPA Response:** Accepted and partially implemented. In the first quarter of 1999, IEPA designed and implemented a process to efficiently and effectively respond to motorists' damage claims. An important component of the process is the 34 Claim Evaluation Centers (CEC) that can be used to provide expert evaluation on the cause of vehicle damage. CECs must meet three criteria:

- a. Automotive Service Excellence (ASE) certification,
- b. Automotive Service Association (ASA) member, and
- c. I/M 240 trained.

To further ensure that claims receive expert and professional evaluations, the Program uses the Better Business Bureau's (BBB) nationally recognized dispute resolution program. The Program also uses IEPA hotlines and the website to obtain feedback on any problems, including those associated with the damage claim process.

## Vehicle Emissions Testing Program

The calendar year 2000 damage claim rate was 6.5 per 10,000 vehicles tested or a total of 1,043 damage claims from the total of 1,607,447 vehicles tested. Over 37% of vehicle owners that used the damage claim process, including CECs and BBB when required, received reimbursement in calendar year 2000.

IEPA will work with the contractor to modify the present damage claim procedures to better document the basis for requiring a customer to visit a Claim Evaluation Center (CEC). The IEPA is now participating in weekly damage claim meetings to assure that all decisions are thoroughly documented.

Finally, IEPA is implementing procedures to review all claim files maintained by the contractor that result in a denial of payment and verifying that documentation supports that the denial was reasonable.

### **3. The IEPA Division of Vehicle Inspection and Maintenance should strengthen the customer service process by increasing the accessibility of available information and options for motorists to submit comments and complaints, and should improve its follow-up with motorists.**

**Findings:** In calendar 2000, Envirotest reported receiving 1,584 comment forms, including 1,043 damage claims, even though stations performed 1.65 million tests. The auditors stated that the comment forms are provided to motorists only upon request.

Further, the comment forms state that a motorist can ask the BBB to investigate Envirotest's response to a customer's comment. In practice, a motorist can only ask the BBB to arbitrate between them and Envirotest. The BBB cannot conduct an investigation to determine if Envirotest damaged the vehicle. The follow-up letter mailed to motorists who did not take their vehicle to a CEC states the claim is closed because Envirotest did not receive any materials from the CEC. Envirotest could set a final deadline to allow the motorist time to contact the CEC in case the CEC did not submit the evaluation form, or in case it was lost in the mail or went to the wrong fax number.

Envirotest responded that they will develop a customer's right poster for each customer waiting area informing motorists of what they can expect, such as customer respect, prompt and courteous service, careful handling of vehicle and other aspects of Envirotest's customer service program. Envirotest also agreed to correct the comment form regarding the BBB, and to add a paragraph in the CEC follow-up letter stating they will reopen the damage claim if the customer contacts them.

**IEPA Response:** Accepted. The Auditor General's customer satisfaction survey reflects the importance that the IEPA and its contractor have placed on customer service with survey respondents providing an overall rating between satisfied and very satisfied. To further enhance customer satisfactions, the IEPA has now modified the vehicle emission test notices that are sent out to all motorists to solicit their opinion and to let them know that comment forms are available at the emission test stations. IEPA also promotes its

## Vehicle Emissions Testing Program

website as a source for additional information. Once at the website, a motorist can e-mail a message to IEPA regarding questions or comments. The Agency's hotline telephone number is also included on the emission test notice to provide another avenue to provide input or resolve issues. IEPA will further strengthen the customer service process by taking the following actions:

- a. Initiate a periodic customer satisfaction mail-in survey process similar to the one used by the Auditor General in this audit. We will also survey a sample of vehicle owners that did not visit a Claim Evaluation Center, as directed by IEPA's contractor, in order to determine the reason for their decision. We will follow-up on any questions or issues raised in the motorist surveys.
- b. Ensure that the contractor develops and displays a customer's rights poster in each customer waiting area.
- c. Ensure that the contractor distributes and fully utilizes the customer service surveys provided at the test stations.

#### **4. The IEPA Division of Vehicle Inspection and Maintenance should establish a written policy manual to guide program operations.**

**Findings:** The IEPA has established a structure to monitor the contractor; however, some monitoring methods and procedures may be enhanced. The Division of Vehicle Inspection and Maintenance (DVIM), which operates the vehicle emissions testing program, did not have a policy manual which specified the methods and procedures used to monitor the program. The program impacts approximately 1.65 million citizens a year by mandating that their vehicles' emissions be tested every other year. The program uses a contractor and has an approved headcount of 133 State employees. A manual could include the following:

- Vehicle emission testing program's purpose, goals, and objectives;
- Administrative procedures, organizational structure, and position responsibilities;
- Training requirements for division employees;
- Management controls, such as the processes for planning, organizing, directing, and controlling program operations, including systems for measuring, reporting and monitoring program performance; and
- Contractual and regulatory requirements, including contract deliverables, reports, reporting requirements, and non-compliance that is subject to liquidated damages.

IEPA imposed a total of \$731,045 in liquidated damages on Envirotest for non-compliance with the contract in FY2000, such as for excessive wait time and performing the incorrect testing procedures. This included \$53,391 in liquidated damages for 1,826 violations reported by test station monitoring personnel—half for not performing a required pre-safety check which may help reduce damage claims.

## Vehicle Emissions Testing Program

**IEPA Response:** Accepted. The Department has implemented one of the most comprehensive monitoring programs in the nation to ensure that Illinois vehicle owners are receiving high quality services from the Illinois vehicle testing program. IEPA uses a team of State Compliance Inspectors, Compliance Supervisors, and Quality Assurance Auditors to conduct performance reviews on a daily basis at the 35 testing stations in the Chicago and East St. Louis metropolitan areas.

The IEPA has been using an on-the-job training program, implemented by veteran staff, to train less experienced State Inspectors and Quality Assurance Auditors. This process is aided by the use of detailed monitoring forms that help guide Inspectors and Quality Assurance Auditors through the inspection and auditing process. However, the Department has now initiated the development of a more formal, written policy manual that will fully document and describe the specific methods and procedures to be used by staff to monitor the program.

### 5. The IEPA Division of Vehicle Inspection and Maintenance should:

- **Establish a written procedures manual, including written procedures for all monitoring forms.**
- **Improve personnel coverage of test stations and complete daily monitoring reports on all test stations.**
- **Document reviews performed by supervisors.**
- **Use all the monitoring reports to improve test stations' performance.**

**Findings:** There are eight different forms that State Inspectors, who are based at test stations, may complete to monitor the contractor and report problems. The auditors sampled reports pertaining to State Inspector monitoring at nine test stations for October 2000 and found only 6% of the reports sampled missing.

IEPA test station monitoring personnel did not have a written procedures manual to guide them in fulfilling their duties and to provide the agency's criteria and expectations for evaluating the performance of stations and their personnel. DVIM had a Field Services Procedures Manual dated April 1993 which related to the basic idle test which was generally phased out in 1999. Envirotest has an operations manual to guide their personnel through the testing process. IEPA drafted manuals during the audit entitled "State Inspector Procedures" and "Field Services Procedures Manual".

IEPA has assigned State Inspectors to individual test stations to monitor test procedures, customer service, cleanliness, and other operations. The test stations did not always have monitoring personnel present due to vacancies, authorized time off and the fact that State employees work 37.5 hours per week while stations are open 55 hours per week.

The auditors noted other weaknesses in monitoring as follows:

## Vehicle Emissions Testing Program

- IEPA is not using all available reports to monitor the test stations and strengthen contract monitoring. Comparison and competition among stations may also improve their performance which could result in better customer service.
- IEPA could rotate State Inspector assignments which may provide a fresh perspective. IEPA could use supervisors of State Inspectors and Quality Assurance Auditors to fill-in for State Inspectors when they are unavailable.

**IEPA Response:** Accepted and partially implemented. The results of the Auditor General's customer satisfaction survey confirm the overall effectiveness of IEPA's monitoring program which is designed to ensure that the program is providing high quality services to Illinois vehicle owners. This previous effort is now in the process of being enhanced as IEPA drafts written procedures covering station-monitoring activities.

To improve personnel coverage of test stations, we use Quality Assurance Auditors and State Inspector Supervisors to help cover vacancies due to staff turnover, vacations, etc. The State Inspector Supervisors are also now signing off on their appraisal of station monitoring reports in order to document their review.

IEPA will ensure that all monitoring reports are routinely used and that information gathered on the reports is used to improve station performance.

### **6. The IEPA Division of Vehicle Inspection and Maintenance should fulfill all the auditing and reporting requirements in federal regulations and review the reports it receives to determine those which may no longer be necessary.**

**Findings:** The Agency conducts some of the audits specified by the contract and federal regulations, but more could be done to comply with all aspects of regulatory and contractual requirements.

- Federal regulations require IEPA to conduct both overt and covert audits of State Inspectors' performance.
- Federal regulations state that the program's auditors should also be audited annually.
- Federal regulations indicate that vehicle emissions testing programs operated by states should conduct a program evaluation, conduct audits, verify the status of exempt vehicles, and report program statistics to the U.S. EPA.

**IEPA Response:** Accepted. Over the last two years, IEPA's Vehicle Emissions Testing Program has been extensively audited including the Office of the Auditor General's (OAG) fiscal year 2000 financial and compliance audit, the OAG's fiscal year 2001 financial and compliance audit, a comprehensive program audit conducted by internal auditors in fiscal year 2001, and the current OAG management audit. We have contacted the U.S. EPA regarding guidance on the auditing and reporting requirements stipulated in the federal regulation. U.S. EPA has not developed such guidance but is willing to work with the IEPA to develop auditing and reporting protocols to be used in association with vehicle testing

## Vehicle Emissions Testing Program

programs in operation nationwide. As another element of our response to this recommendation, we will enhance current auditing activities to include the following:

- a. Quality Assurance Auditors will be provided additional training on auditing methods and procedures for conducting audits of contractor lane inspector activities. IEPA will be utilizing its internal auditors and a University of Illinois consultant to conduct the audit training.
- b. The IEPA will conduct a review of operational reports received from the contractor to determine which reports should be discontinued.

Also, the IEPA has now fully implemented its own covert auditing program to supplement the program run by the contractor.

### **7. The IEPA Division of Vehicle Inspection and Maintenance should establish written procedures for imposing liquidated damages, and formally follow-up on the liquidated damages imposed to ensure that the contractor is taking corrective action.**

**Findings:** IEPA imposed \$731,045 in liquidated damages in FY2000, and those funds were withheld from contractor payment as follows:

- Improper procedures ----- \$241,530
- Excessive wait time ----- \$174,500
- Loss of data ----- \$170,399
- Late/missing records ----- \$ 96,091
- Customer service ----- \$ 20,950
- Other ----- \$ 27,575

The Agency Project Manager determines which of the possible non-compliance items to include or exclude. No reports are prepared to show the number and amount of potential non-compliance items submitted by supervisors that were not assessed liquidated damages. There are no written procedures, and one individual—the Agency Project Manager—makes a determination of whether procedures identified by State Inspectors constitute non-compliance and are subject to liquidated damages.

Procedures that govern liquidated damages could be written to guide this process such as:

- Purpose of liquidated damages;
- Errors that indicate contractual non-compliance eligible for liquidated damages;
- Criteria for determining whether liquidated damages apply;
- Review process to ensure that all possible liquidated damages were imposed;
- Imposition of liquidated damages;
- Process for contractor to respond and contest;
- Factors considered by the program in reducing liquidated damages;
- Final assessment of liquidated damages; and
- Controls to ensure contractor acts to correct the non-compliance.

## Vehicle Emissions Testing Program

**IEPA Response:** Accepted. The current emission test contract contains significant discussion and written guidance on the liquidated damages process. However, we will issue additional detailed guidance on the procedures for imposing damages and include a formal corrective action process for the contractor.

- 8. The IEPA Division of Vehicle Inspection and Maintenance should ensure that manually entered wait time information is monitored more closely by its test station monitoring personnel to verify controls over motorist wait time are working effectively. Stations with high manual data entries should have their wait time entries closely analyzed to determine the cause and to correct any problems.**

**Findings:** IEPA's contract with Envirotest establishes a 15-minute time limit on the amount of time that motorists should have to wait in line to have their vehicles' emissions tested. The contract allows four testing days in a calendar month that each test station can exceed the 15-minute average since certain days of the month, including the last day, are typically more busy. Test stations use ticket dispensers which automatically print the time on the ticket taken by the motorist at the beginning of the queue. If the ticket dispenser is not working, the procedure is for contractor personnel to stand by the dispenser, issue tickets manually, and write the arrival time on the ticket.

IEPA learned from the Quality Assurance Auditors that correct procedures were not always being followed in early 2000. The arrival time was not written on the ticket, or no ticket was issued to the motorist. In some instances, when it was the motorist's turn to be tested, the lane inspector would look at the time and write down that time as the time the motorist arrived.

**IEPA Response:** Accepted. Current monitoring procedures require the State Inspector to routinely inspect for the proper functioning of the ticket dispenser. If the ticket dispenser is not functioning properly, the State Inspector reviews the operations of the contractor to ensure that the proper procedure is being used to manually record wait times. IEPA analyses have shown that the IEPA actions were timely and sufficiently appropriate to ensure that the entry of manual wait times has not affected the accuracy of reported wait times which averaged 7.5 minutes in calendar year 2000.

To enhance existing IEPA procedures in this area, the IEPA now requires the contractor to notify the State Inspector when the ticket gate is not working properly and the contractor has switched to manually entering the wait times. IEPA is adding the necessary procedures to the IEPA State Inspector's operations manual to ensure that manually entered wait times are closely scrutinized and that instances causing high manual data entry are examined and corrected.

## Vehicle Emissions Testing Program

- 9. The IEPA Division of Vehicle Inspection and Maintenance should direct the contractor to inform motorists who file a damage claim that they may view a videotape of their vehicle's emissions act.**

**Findings:** Video cameras on each lane at each testing station are used to record the testing of vehicles' emissions and service to customers. The surveillance cameras were required by the RFP when the contract was bid. The video monitors are located in the State Inspectors' offices at the testing stations and display six, 3-inch square pictures. The pictures are small and their resolution is poor since the video system provides time lapse, non-constant video without sound. The system is used for making video recordings for evidence gathering and identification purposes to deter bribes to inspectors.

The auditors received conflicting information about whether motorists can view the video tape of their test when they file a damage claim. The IEPA program manager indicated during a meeting with the auditors that the videotapes were generally not available to motorists. Envirotest claimed it had always made the videotape available to motorists upon request. However, Envirotest failed to provide the name of any motorist who had been shown a videotape of their test. In three damage claims that auditors reviewed, the test station manager stated that there were some problems with videotaping, which resulted in the video not being available for viewing.

IEPA's test station monitoring personnel need to ensure that the videotapes are being made when they complete their daily monitoring reports.

**IEPA Response:** Accepted and partially implemented. The contractor keeps a supply of videotapes adequate to capture 60 days of testing activity at all of the 35 testing stations. IEPA currently provides owners with an opportunity to review a videotape, if they make such a request. However, IEPA has implemented procedures to better inform the vehicle owners of their right to view the tapes. The contractor has revised correspondence advising motorists filing a damage claim that they can set up a time to view the videotape of their emission test. Motorists will be requested to make their request to view the tape within 60 days of the date their vehicle was tested. This time period allows the contractor to retrieve the appropriate tape so the testing images can be preserved for viewing.

- 10. The Illinois Environmental Protection Agency and the Secretary of State Office should initiate a formal review of the vehicle emissions testing program's enforcement component to determine if the State should use a registration denial system or make other changes to increase efficiency and decrease cost. In addition:**

- IEPA should develop a system to verify motorists' self-certifications from the vehicle emissions test as required by federal regulations.**
- Secretary of State's Office should track and report the number of actual driver's license and vehicle license plate suspensions.**

## Vehicle Emissions Testing Program

**Findings:** Illinois allows vehicles to be exempted from an emissions test if motorists certify that the vehicle is no longer used within the emissions test area, has been junked, or has been sold. IEPA has not verified whether these self-certifications were valid, but indicated it will be doing so in the future.

Illinois' method of enforcing the requirements of vehicle emissions testing is by matching vehicle registrations with vehicles whose emissions have not been tested. Owners who fail to comply have their driver's license suspended, followed by a vehicle registration suspension. 25 of 29 other states surveyed deny registration (license plate renewal) to owners whose vehicles did not have an emission's test.

Illinois suspends the driver's license of the vehicle owner eight months after the test month and suspends vehicle registration 10 months after the test month. Therefore, polluting vehicles could be legally driven by someone other than the vehicle's owner for two more months. In a registration denial system, vehicles cannot be legally driven without complying with the program.

Illinois' enforcement method resulted in approximately 2.25 million reminders and warnings to motorists in FY2000. IEPA and the Secretary of State's Office may wish to conduct a cost-benefit evaluation of its computer-matching enforcement program to determine if it would be cost-effective to use a registration denial system which may reduce reminder and warning notices.

**IEPA Response:** Accepted and partially implemented. The vehicle emission testing program's enabling legislation requires the use of the current enforcement process involving driver license and vehicle registration suspensions. Compared to the registration denial system used in other states, the Illinois enforcement system is a much more customer friendly process. It provides for a higher level of notification to the vehicle owner that there is a problem with their compliance with the vehicle testing program and provides for a longer period for the owner to come into compliance before affecting their right to drive the vehicle. We believe the extra effort given in notifying vehicle owners and the extra time allowed for them to comply, results in a much higher level of customer service than the vehicle registration denial approach.

The IEPA met with the Secretary of State staff on September 19, 2001 and initiated discussion and a formal review of the current enforcement process. We will continue to work with the Secretary of State's office to examine any opportunities to improve efficiency and to reduce costs involving the enforcement function including a review of the registration denial approach used in other states.

IEPA will be using a statistical sampling approach to help support and expand the verifications of test exemptions already provided by the Secretary of State computer matching process.

**Secretary of State's Response:** The Secretary of State's Office agrees with the Vehicle Services & Driver Services Departments along with the IEPA would benefit from a formal

## **Vehicle Emissions Testing Program**

review of the Vehicle Emissions Test program. Our ongoing goal in the Secretary of State's Office is to increase efficiency and decrease cost in the IEPA Enforcement Process.

The Vehicle Service Department currently has the capability to track and report the number of actual IEPA registration suspensions applied and cleared. The Driver Services Department has already begun analyzing the present computer stored statistical information from this program in order to improve on the data captured relating to actual driver's license suspensions.