

JTC 2014 Vehicle Registration and Titling Study-----Identified Issues: Observations and Recommendations DRAFT

	Observation/Comment	Suggested by:	Potential Improvement or Recommendation	How to Implement <i>Law change (RCW), Policy change (Policy), Tech Mod, Cost increase (\$+) Cost savings (\$-)</i>	Comments
1	<u>Paperwork reduction:</u> Some Auditors have implemented green policies limiting paper subagents mail to the auditor (King) or worked with DOL to reduce the amount of paper they have to mail to DOL (Benton)	Subagent Auditor	DOL should work with subagents and auditors on a Lean or other process improvement effort to review paperwork retention, mailing and archiving requirements, and consider opportunities for scanning and electronic transmittal, with a goal of reducing mailing, personnel and other costs while ensuring fraud protection and relevant legal requirements are met, and provide for consistency among Auditors and for subagents.	TBD. Potential RCW, Policy Tech Mod \$+ and \$-.	No cost to convene process improvement workgroup; implementation of changes could require RCW and policy changes, and may result in cost increases for equipment and cost savings (mailing, archiving, personnel, other). Provide options rather than mandates, because what works for one county may not work for another. TechMod may address many issues.
2	<u>Mailing costs:</u> Would like option to use UPS rather than USPS, but a law/regulation exists that requires government to use USPS.	Auditor		TBD \$-	What requirements are in place?
3	<u>Mailing:</u> DOL mails inventory (tabs, license plates, title paper, etc) to Auditor and Subagent has to go to Auditor to pick it up. Why can't DOL mail it directly to the Subagent?	Subagent		Policy Tech Mod \$+ or \$-	How might this affect inventory management? Will Tech mod affect inventorying and provide more flexibility?
4	<u>Training:</u> DOL trainers don't always provide consistent information when they do trainings across the state.	Auditor(?) Subagent	DOL should improve training of their staff.	DOL & license agents \$+ and \$-	DOL is aware of issue. It is developing certain tutorials to improve training. There are further discussions with licensing agents.
5	<u>Training:</u> The people who answer Auditor/Subagent questions over the phone don't provide consistent answers to questions.	Auditor Subagent	DOL should improve their staff training to ensure consistent answers are provided.	Policy change	DOL is aware of issue. Retirements have impacted this program.

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6	<u>Training:</u> Better understanding is needed among DOL, Auditors, and Subagents of respective roles and external pressures.	Auditor	Auditors should periodically visit and observe their Subagents. DOL should periodically visit and observe Auditors and Subagents.	Policy	Approaches vary among counties.
7	<u>Training:</u> Could process for Subagents to get in-house training count as part of the required 10 hours of training to maintain certified status?	Subagent		Policy	Clarification by subagents requested.
8	<u>Training:</u> Would like more face-to-face training from DOL	Auditor		Policy Likely \$+	
9	<u>Training:</u> DOL should require training of Subagent and Auditor office managers; they all need to have the same training.	Subagent	Improve uniformity of training on issues; deliver training same among Auditors and among Subagents and between the two groups. Training should be revised and updated consistently to be effective.	Policy	Use of videos or webinars could improve consistency. Certain training approaches would not require office closures or travel expenses.
10	<u>Training:</u> DOL regularly attends Thurston County semi-annual subagent training sessions hosted by Auditor. Other counties would like DOL to attend theirs as well.	Auditors		Policy \$+	Should DOL staff do this across the state? May require additional DOL staff time. Teleconference approach?
11	<u>Supervision of subagents:</u> DOL should directly supervise subagents, and take Auditors out of the picture	Auditor		RCW	Auditor: DOL doesn't have resources to supervise all subagents, so Auditors need to. By Auditors supervising Subagents, counties derive money for that responsibility. As a form of risk management, State has passed liability to county for subagent errors. State would assume all liability if DOL directly supervised Subagents.

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12	<u>Supervision of subagents:</u> No uniform standard for Auditors to supervise Subagents. Some Auditors visit subagents regularly (e.g. 4X/yr) while others rarely do.	Auditor Subagent	Guidelines developed through discussions among DOL, Auditors, and Subagents.	Policy	Is uniformity needed? Do smaller counties with fewer resources need help to appropriately supervise?
13	<u>Supervision of subagents:</u> DOL and Auditor both audit subagents, and it's duplicative and there may be more efficient use of resources.	Auditor		RCW Policy	Auditor: Disagree. DOL's audits are for a specified time, and accountability audits. Auditor audits review document review, inventory control, collections, training, and customer service. Pierce County audits are same as the state.
14	<u>Fraud:</u> More training and emphasis on fraudulent transactions. Noted as an emphasis area for DOL.	Subagent	DOL should provide more training and support for licensing agents. Subagents asked to expand on this issue.	Policy \$+ \$- (longer term)	Noted that persons may present incomplete documents and when denied, appear to return with fraudulently changed documents. (signatures, etc.)
15	<u>Fraud:</u> Auditors should let Subagents know when they are investigating one of the Subagents' employees for fraud.	Subagent	None		DOL: Because the Fraud Investigator needs to identify whether the Subagent is involved in the potential fraud along with the employee, the Subagent should <u>not</u> be told when an employee is being investigated.
16	<u>Policy consistency:</u> With 39 different Auditors, DOL policies are often interpreted differently from county to county. This results in lack of consistency in policy implementation.	DOL		Policy	Is this a problem? What needs to be addressed where uniformity is necessary; and/or where it is desirable?
17	<u>Improvement processes:</u> There is no current process to identify candidates for LEAN or other process improvements opportunities.	Subagent	Require Auditors, Subagents and DOL to meet together at least yearly. Could be opportunity for joint training, discussion of potential process improvements, and improve communication.	Policy \$+ (meeting, staff cost) \$- (joint training)	This could take various forms depending on subject. Video conference, Webinars, other mechanisms.

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18	<u>Improvement processes:</u> Eliminating the requirement to periodically replace license plates presents opportunities for process improvements.	Auditor	Convene Lean or other process improvement to discuss opportunities.		
19	<u>Improvement processes:</u> Consider eliminating tabs and instead issue each vehicle a bar code that contains registration information. Could potentially be used to count VMT, collect tolls, and other things.	Auditor		Policy \$+ initially	More far reaching in scope and technology. Is this a TechMod opportunity?
20	<u>Improvement processes:</u> With a growing shift to online transactions and self-service, opportunities for efficiencies exist.	Auditor	Convene Lean or other process improvement to discuss opportunities.	Policy \$+ initially \$- implemented	
21	<u>Improvement processes:</u> Improve response times for licensing agent calls to DOL.	Subagent Auditor (?)	Improve staffing and training levels and DOL. (Related to item 5.)	Policy \$+(?)	If additional staffing is required, may cost more money.
22	<u>Other:</u> DOL requires Subagents to send Operator Summary Reports daily, which are often erroneous due to unavoidable issues (like backing out of a screen). Results in lots of extra work between DOL and Auditor/Subagent.	Subagent	DOL should stop requiring Operator Summary Reports, and instead have the Subagent send (some other report) which is more accurate.	Policy	Does this requirement provide a necessary tracking item?
23	<u>Titles:</u> A DOL employee is rejecting title work when customer's signature is printed, rather than cursive. Subagent believes the legal definition of a signature does <u>not</u> require it to be cursive.	Subagent	NA	Policy (or perhaps simply training)	DOL received the complaint, tends to agree with the subagent's interpretation of the problem, and is looking into resolving it.

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24	<u>Titles:</u> Customer's signature on title work must be the legal signature; if legal name is James Bernard Dough, the paperwork will be rejected if it's signed JB Dough. To correct the signature, customer needs to get revised signature notarized.	Subagent	Caution about overly prescriptive RCW or WACs and policies.	RCW WAC	A work-around has been developed but this is an example of an overly prescriptive RCW or WAC.
25	<u>Titles:</u> Allow dealers to do their own title work and issue license plates.	Auditor			Could provide better customer service.
26	<u>Titles:</u> Quick titles – allow all titles to be quick titles, and reduce the \$50 fee.	Auditor			Does this increase vehicle fraud? Higher risk to Auditors and subagents?
27	<u>Titles:</u> Title work should be public (Auditors) or private (Subagents and/or dealers) but not both.	Auditor			Do other states use private vendors exclusively? How well does that work?
28	<u>Other:</u> Terminal and equipment issues. Unnecessary to have a dedicated terminal and data line for title and registration work. There are ways to protect information without a dedicated terminal and data line.			Tech mod Policy RCW \$+ and \$-	What are TechMod requirements?
29	<u>TechMod:</u> Will address many issues DOL is asking counties to provide two individuals who will work at DOL to provide technical and experiential advice on the TechMod project for a period of several months.	DOL Auditor Subagents	Identify issues: Involvement of Auditors		Scan and upload documents—less paper Other types of revenue collections Technology (exclusive terminals, etc.) Subagent involvement?