

APPENDIX O - DOCUMENT HANDLING PROCEDURES - DIVISION PERSONNEL

1.0 INTRODUCTION

Delaware will implement, maintain, and quality assure (QA) the procedures to instruct individuals in the enforcement process regarding how to conduct their respective tasks. This will include the development of written procedures for I/M enforcement document handling and processing, and audits of the personnel who will follow these procedures. DNREC will implement and monitor the processing of registrations done by the Division personnel for the I/M program. On-going periodic audits will be used to QA test records, waivers, and registration renewals. DNREC will track the performance of registration personnel using accepted quality control practices. Evaluations of audit personnel will be conducted on a regular basis.

Only documents used for renewing registrations and issuing waivers are included in this appendix. Delaware has structured the data handling and storage systems in such a way that all enforcement and compliance data is in electronic form and pass/fail decisions are made electronically. Only in the case of host computer failure will hard-copy documents, other than inspection stickers and registration tabs, be generated.

2.0 DOCUMENT HANDLING PROCEDURES

2.1 Vehicle Registration Procedures

Before issuing registration tabs and cards, registration clerks must confirm that all I/M inspection requirements have been met. The clerks will use criteria and procedures similar to the following to verify compliance.

1. Ask the vehicle owner for the proof of insurance, and proof of having received either a passing vehicle inspection or a waiver.

2. Enter the vehicle identification number (VIN) or the registration number into the computer to access the vehicle's records.
3. Verify that the name and address on the electronic vehicle record matches the information on the registration renewal form.
4. Verify that the registration number and VIN on the electronic vehicle record matches the VIN and registration number on the registration tab. Lockout will occur, preventing a registration renewal or a new registration to be issued when the vehicle has not passed inspection. Clerks will request supervisor's assistance when an inspection certificate indicates a vehicle has passed inspection and the electronic record indicates a failure.
5. If the vehicle passed all the elements of the inspection test or has received a waiver, then a new registration tab will be issued.

2.2 Issuing Waivers

This section describes the requirements for issuing a waiver consistent with the EPA regulations. The following criteria must be satisfied before the division personnel can issue a waiver.

1. Verify that the vehicle failed the retest after all qualifying repairs were completed.
2. Verify that only those emission related repairs performed by certified repair technician and directly applicable to the cause for the test failure are being applied towards the waiver. Repairs of primary emission control components may be performed by non-technicians (e.g., owners) to apply toward the waiver limit. The waiver would apply to the cost of parts for the repair or replacement of, the following list of emission control components: oxygen sensor, catalytic converter, thermal reactor, EGR valve, fuel filler cap, evaporative canister, PCV valve, air pump, distributor, ignition wires, coil, and spark plugs. The cost of any hoses, gaskets, belts, clamps, brackets or other accessories directly associated with these components may also be applied to the waiver limit. Waivers are not to be issued to vehicles for tampering-related repairs. The cost of

tampering-related repairs is not applicable to the minimum expenditure. Exemptions for tampering-related repairs may be possible if it can be verified that the part in question is no longer available for sale.

3. Verify that all available warranty coverage has been used to obtain needed repairs before expenditures can be counted towards the cost limits unless the warranty remedy has been denied in writing from the manufacturer or authorized dealer.
4. Ask the motorists to provide verification of inspection retest and a repair receipt showing that the qualifying repairs were performed. The repair receipt shall indicate, at a minimum:
 - a. a detailed list of repairs completed;
 - b. the repair facilities identification number;
 - c. the repair facility's location;
 - d. telephone number;
 - e. identification and signature of the repair technician;
 - f. costs of parts and labor; and
 - g. repair date.
5. Also verify that the repair receipt appears to be authentic and not tampered with in any way.
6. Verify that the motorist spent a minimum of \$75 for pre-81 vehicles and \$200 for 1981 and newer vehicles shall be spent in order to qualify for a waiver.

Waivers will be tracked, managed, and accounted for with respect to time extensions or exemptions in the Division's database so that owners or lessors cannot receive or retain a waiver improperly.

3.0 DOCUMENT HANDLING AUDIT PROCEDURES

Periodic audits will be performed on division personnel to verify that proper document handling procedures are being followed. The goal of these audits is to determine whether personnel are correctly performing their jobs and whether further training is necessary.

3.1 Vehicle Registration

The audit of the vehicle registration practices can be done during the records audit visit described in Quality Assurance Enforcement Procedures (Appendix 12- (a) (4)) . The auditor will select a random sample of a statistically significant number of test records to review for inconsistencies or improper procedures using any of the following checks:

- Perform a records audit verifying the number of windshield stickers issued versus the number of recorded registrations;
- Verify the correct compliance determination was made based on the criteria in Section 2.1 of this appendix;
- Verify that all registration requirements were met by the vehicle owner; and
- Verify that proper procedures were followed during vehicle registration.

3.2 Waiver Processing

Audits of the waiver processing personnel can be done during the on-site records audit. The auditor will again select a random sample of test records to verify that the necessary criteria were met. This can be done by performing the following checks:

- Verify proper vehicle owner documentation (i.e., repair forms, VIR, proof of general assistance);
- Verify that waiver requirements in Section 2.2 were met;
- Check documentation for signs of tampering (e.g., repair forms, VIRs); and
- Verify that proper procedures are being followed for issuing waivers.