



CENTRAL TEXAS REGIONAL  
**MOBILITY AUTHORITY**

September 30, 2020  
**AGENDA ITEM #12**

---

Discuss and consider approving  
Work Authorization No. 1 with  
Cofiroute USA, LLC for the automation  
of the Habitual Violator Program

<b>Strategic Plan Relevance:</b>	Regional Mobility
<b>Department:</b>	Operations
<b>Contact:</b>	Tracie Brown, Director of Operations
<b>Associated Costs:</b>	\$498,680
<b>Funding Source:</b>	Toll Revenues
<b>Action Requested:</b>	Consider and act on draft resolution

**Summary:**

**Background** - In September 2018 the Mobility Authority's Board of Directors approved the implementation of a habitual violator program. Texas law describes habitual violators as those customers who have accumulated 100 or more unpaid tolls in aggregate in a 12-month period and have been issued two notices of nonpayment. Habitual violator enforcement remedies include publication of the toll scofflaw's name, a vehicle registration block and a ban of the vehicle's use of the entity's toll facilities. Vehicle impoundment is possible for those who violate the vehicle prohibition.

The goals of the Mobility Authority's habitual violator program are to ensure that all users pay their fair share, encourage prompt payment and promote electronic toll tag usage. The Authority's habitual violator program was deployed in July 2019. The first set of vehicles prohibitions were approved in November 2019 by the Authority's Board of Directors. To date, approximately 2,500 unique vehicles have been included in the Mobility Authority's habitual violator program.

A recent independent analysis found that the program has resulted in more payments and reduced toll road usage by violators deemed as "habitual" after remedy letters. To continue the success of the program and address these chronic violators on a wider and more systematic scale, system enhancements are required to automate the process.

**Current Action** - Since the deployment of the habitual violator program in July 2019, the supporting operating processes and business requirements have been continually refined. These updated specifications have resulted in a need for automating the following processes in order to improve the program's performance:

- applying the approved \$50 Enhanced Enforcement Administrative Fee to each HV account the determination step;
- integrating the implementation and removal of a DMV registration hold;
- tracking requests for administrative hearing and updating customer records with hearing results;
- implementing the courtesy pre-determination letter;
- integrating with the Authority's license plate reader technology to allow for the quick upload of a prohibited vehicle hot list;
- alerting customers of their habitual violator status when they log into the payment portal; and
- developing a series of reports to report on certain elements of the habitual violator program.

The system will also facilitate the creation and tracking of payment plans and to monitor payment plan defaults. The total cost for these process and system enhancements is \$498,680.

**Previous Actions** - In December 2018 the CTRMA Board of Director approved an amendment of the Agreement with CUSA outlining CUSA's expected recompense for processing and collecting Pay By Mail toll transactions paid from post-paid accounts, overpayments and prior to notice generation. The amendment also added two new pay items that to the original pricing schedule, compensation for insufficient funds and compensation for out of state license plate lookups.

In July 2019 the Board approved a second amendment modifying the compensation schedule to support extended call center hours, the administration of the Qualified Veteran Program and habitual violation enforcement support.

**Staff Recommendation** - Staff recommends approval of Work Authorization No. 1 with Cofiroute USA, LLC to facilitate the automation of the habitual violator program.

**Backup Provided** - Draft Resolution  
Draft Work Authorization No. 1

**GENERAL MEETING OF THE BOARD OF DIRECTORS  
OF THE  
CENTRAL TEXAS REGIONAL MOBILITY AUTHORITY**

**RESOLUTION NO. 20-0XX**

**APPROVING WORK AUTHORIZATION NO. 1 WITH COFIROUTE USA, LLC FOR  
THE AUTOMATION OF THE HABITUAL VIOLATOR PROGRAM**

WHEREAS, by Resolution No. 18-005, dated February 28, 2018, the Board approved an agreement with Cofiroute USA, LLC for pay by mail, violations processing, collections and customer services (the “Agreement”); and

WHEREAS, by Resolution No. 18-049, the Board adopted a Habitual Violator Policy for the implementation of toll enforcement remedies; and

WHEREAS, the Mobility Authority now desires to automate certain elements of the Pay By Mail Back Office System to further enhance the performance of the Habitual Violator Program; and

WHEREAS, the Executive Director and Cofiroute USA, LLC have negotiated proposed Work Authorization No. 1 under the Agreement in an amount not to exceed \$498,680.00 for the automation of certain processes of the Habitual Violator Program; and

WHEREAS, the Executive director recommends that the Board approve Work Authorization No. 1 with Cofiroute USA, LLC in the form or substantially the same form as attached hereto as Exhibit A.

NOW THEREFORE, BE IT RESOLVED, that the Board approves Work Authorization No. 1 with Cofiroute USA, LLC in an amount not to exceed \$498,680 for the automation of the Habitual Violator Program; and

BE IT FURTHER RESOLVED that the Board authorizes the Executive Director to finalize and execute Work Authorization No. 1 with Cofiroute USA, LLC on behalf of the Mobility Authority in the form or in substantially the same form as is attached hereto as Exhibit A.

Adopted by the Board of Directors of the Central Texas Regional Mobility Authority on the 30<sup>th</sup> day of September 2020.

Submitted and reviewed by:

Approved:

---

Geoffrey Petrov, General Counsel

---

Robert W. Jenkins, Jr.  
Chairman, Board of Directors

**Exhibit A**

**PAY BY MAIL SERVICES**



---

***WA-001 - Habitual Violator Program Automation  
August 12, 2020***

**Table of Contents**

**1 INTRODUCTION .....3**

**2 PURPOSE.....3**

**3 SCOPE .....3**

    3.1 ACTIONS TO BE TAKEN AND IMPACTED AREAS:..... 5

    3.2 Affected Subsystems ..... 6

    3.3 ASSUMPTIONS..... 6

**4 Costs .....8**

    4.1 Payment Milestones..... 8

**5 Acronyms and Definitions.....9**

**6 Final Approvals.....9**

## 1 INTRODUCTION

The Central Texas Regional Mobility Authority (“CTRMA”) has requested certain changes to its Pay By Mail Back-Office System in order to make enhancements to the Habitual Violators (“HV”) processes and supporting Payment Plan functionality. This Work Authorization outlines the scope of these enhancements and agreed upon compensation. Any terms not defined in this Work Authorization will have the meanings defined in the Master Agreement between CTRMA and Cofiroute. This Work Authorization is subject to the terms of the Master Agreement, including without limitation its provisions regarding obligations, variations, coordination, delay and force majeure.

## 2 PURPOSE

The Habitual Violator (HV) program identifies customers who have unpaid transactions for a single license plate within a 365-day timeframe per Senate Bill 1792. The HV program should be able to implement for both agencies. Customers will provide one warning letter (Pre-Determination) and notification of Habitual Violator (Determination) with options for resolving the outstanding balance. The customer may submit a request for an administrative hearing. Customers take no action to resolve their delinquent account in response to the Pre-Determination and Determination notifications, they are subject to an additional enforcement fee, a vehicle registration hold placed with the Texas Department of Motor Vehicles (TxDMV), and a vehicle prohibition on all Authority toll facilities. Payment Plans functionality will also be implemented in the BOS due to dependencies in the HV business rules allowing HV accounts relief from some HV remedies (Registration Hold) when a given percentage threshold of the payment plan are paid.

## 3 SCOPE

The PBM Back-Office System needs to be updated to support the HV requirements defined in the latest business rules document section 2.19, Habitual Violator Business rules (“HV Rules”, available at [The Mobility Authority Business Rules 2.11\\_Feb\\_2020.docx](#)). Notable requirements of the Habitual Violator automation are:

1. Identify the all eligible HV customers with a minimum configurable number (100) of unpaid trips with the transactions aged and mailed to Notice of Toll Violation letters in the last 365 days. Flag any license plate that has multiple account numbers for the exception queue.
2. Implement the changes related to HV determination business rules, track the payments received after the predetermination and in every stage thereafter to make sure customer still qualifies to be in HV determination or Registration hold before aging further.

3. Apply a \$50 Enhanced Enforcement Administrative (EEA) Fee to each HV account during HV determination and update NTV template for the \$50 EEA Fee in invoices.
4. Integrate the implementation of DMV registration hold and removal of registration hold.
5. Implement the CUSA user interface in the CSC and TVC application module that will reflect any administrative hearings, such as hearing requests, hearing results updates, adjusting the appeal fee, based on CTRMA's approval handling the finance integration and allowing certain payments in the payment screen. (Note: This administrative hearing fee is applicable to CTRMA only).
6. Implement the following letters with print vendor CSG
  - a. Predetermination letter for both agencies
  - b. Determination letter for both agencies
  - c. DMV Registration hold letter for both agencies
  - d. Prohibition notice letter for CTRMA
  - e. Termination letter for both agencies
  - f. DMV registration removal letter for both agencies
  - g. Prohibition removal letter for CTRMA
7. Implement the following user interface changes for handling the business rules defined in section 2.19, Habitual Violator Business rules in the document ([The Mobility Authority Business Rules 2.11\\_Feb\\_2020.docx](#)).
  - a. HV screens / View screens
  - b. HV status screens driven based on user privileges
  - c. Upload approved prohibition list
  - d. HV configurations related screen
  - e. Manual review screen for CSR with plates having multiple account numbers
8. Implement business rule change to stop sending an account to Collections if customers are identified as a Habitual Violator
9. Implement business rule changes to the existing invoice system related to HVs
  - a. Stop aging the transaction which is already in NTV (Notice of Toll Violation)
  - b. Continue invoices as NTV
  - c. Stop sending invoices if there are no transactions/fee for a billing period
10. Exclude the HV customers from pre-court or court selection
11. Integrate with Vigilant vendor and provide ALPR (Automatic License Plate Recognition) hot list for CTRMA agency as per the ICD in Appendix 2 ([ALPR Hot List ICD v1.1.docx](#))
12. Create reports related to HV as defined in Appendix 4, ([HV Report Requirements.xlsx](#))
  - a. Vehicle registration hold report
  - b. Prohibition notice reports
  - c. Report on different HV statuses



13. Show an indicator of text to display the HV Status in the Customer portal when customer logs in. CTRMA and CUSA to provide the approved text.

14. Optional Item #1: System should support customers registered in a configurable list of counties to be excluded from the list sent to the Texas DMV for registration hold.

The PBM Back-Office System needs to be updated to support the payment plans requirements defined in the latest business rules document, Appendix 1 ([The Mobility Authority Business Rules 2.11\\_Feb\\_2020.docx](#)) and also further described in the Payment Plan Change Description document, Appendix 3 ([PaymentPlanChangeDescription.docx](#)). Notable requirements are:

15. Payment Plans will be created for all outstanding unbilled tolls and fees on any account in the CTRMA BOS.

16. Payment plans created in the system will enforce configurable allowable minimum and maximum payment plan balances owed, payment plan term types, term lengths, percentage or fixed amount down payments, and default configuration values.

17. When a payment plan is created all the aging will be stopped/held other than the initial invoice, toll bill notice (TBN). However, if a TBN remains unpaid after the due date, the payment plan is considered defaulted.

18. Upon Default, the transactions will resume aging based on their last invoice due date. For HV customers, the aging will start from the point when the account went into HV.

19. Notifications would be sent to customer's mobile and email address upon creation of the payment plan, just prior and on default.

20. A new BOS Payment Plan report will be created providing Program and Agency Summary information along with the ability to drill down and provide the following detail data: Account Number, Customer Name, Payment Plan Balance, Collected Amount, % paid, Outstanding Balance, created date, next payment date, status at a minimum.

21. The Collections interface will be updated to provide notifications to PennCredit when accounts go into HV status and when payment plans have been established.

### **3.1 ACTIONS TO BE TAKEN AND IMPACTED AREAS:**

- Update the ICD with print vendor to include the new templates identified and update the CTRMA BOS to support them. Updates to the existing NTV Template to show the EEA fee element in transaction details section.
- Perform integration testing with print vendor related to HV changes.
- Implement integration with vigilant vendor to provide ALPR hot list details and SFTP timings
- Validate and test the collection interface corresponding to HV business rules and Payment Plans updates.

- Integrate HV process with DMV probe request, registration hold, and registration release automated processes.
- Implement payment plans screens to allow for creation, updates, payments, and past payment plans.
- Internal QA of the changes and regression testing of the application before presenting it to CUSA/CTRMA for the acceptance.
- Update design documents and training manuals as needed

### 3.2 AFFECTED SUBSYSTEMS

The following BOS subsystems have been identified as areas that will be impacted by the change in the approach for application of the collections fee. Those systems include:

- Collection Transaction Processor and Batch Creation
- CSC Portal
- TVC Module
- Collections Interface modifications to exchange information between the vendor and the PBM system
- External or Self-service portal
- Court and Habitual Violator modules changes related to collections amount calculations
- Write-off job
- Reports

### 3.3 ASSUMPTIONS

1. Customers requesting Hearing/Appeal are handled through operational process.
2. CUSA will download the eligible transactions list and either
  - a. provide input to CTRMA board
  - b. or upload the approved list through operational process. System will facilitate to download eligible prohibition list / upload the approved prohibition list.
3. Providing evidences to Justice of Peace and/or County courts is an operational process.
4. For the customers who are removed from HV process due to disputes, the transactions that stopped aging at NTV will resume aging and will be moved to Collections as per the regular invoice cycle.
5. System will facilitate removal of registration hold/removal from prohibition list. There will not be any approval process for these actions. The letter will be generated in the nightly batch process and will be sent to the print vendor CSG.
6. CTRMA TBOS will assess the court filing fee (\$100) from both court and HV customer when the payment is received and will update the appropriate general ledger account when it is paid to the court at the time of hearing. Submitting the court filing fee to the court and any refund of the court filing fee back to the customer is outside of CTRMA BOS. If the customer is not guilty,

any refund of the administrative fee is done outside of the CTRMA BOS and there will not be any refund entries in the BOS. Administration Hearing Fees will be tracked separately from Court Filing Fees.

7. HV Turn On/Off condition. If HV is already ON and customers are in HV process and for some reason the configuration is turned OFF for one of the agencies, new HV process will stop immediately on the day of the configuration effective date. However, the change of the BOS configuration will not impact the customers who are already in the middle of HV process and the existing HV customer accounts would continue to age accordingly.

8. All the letter templates would be same for both CTRMA and NETRMA and configurable by agency.

9. View only manual screen for CSR to review license plates with multiple accounts.

10. The interface documentation updates are proposed in the Payment Plan Change Description document, Appendix 3 ([PaymentPlanChangeDescription.docx](#)). PennCredit must be able to process the updated files.

11. External website changes will be limited to the HV status indicator and to allow payment plan payments to be accepted for all accounts.

12. Any new transactions posting after a payment plan is set up in the BOS would be part of the Toll Bill Notice as per the current process. The payment plan amount would not be shown in the previous charges section of the Toll Bill.

13. Once a payment plan is Defaulted, the outstanding payment plan amount would be shown in the previous charges section of the subsequent notice or bill. Per the current process the system will generate the notice (TBN, 30 days past due or 60 days past due) based on the oldest transaction stage associated with the payment plan.

14. Payment Plan balance would be a separate line item in the TBN notice and not be included in the Total Amount Due in the Toll Bill Notice.

15. When a payment is done for an outstanding TBN (in the CSC portal, external portal or lockbox via current functionality), it would be applied to that invoice only.

16. There would be a provision to pay the payment plan amount separately in customer portal and in the CSR portal.

17. Any account level payment follows the current FIFO order business rules.

18. Dispute transactions would also be included in the payment plan balance.

19. Any approved disputes, other adjustments or payment reversals would be adjusted with the last term amount of the active payment plan.

20. Once the payment plan is fully paid, the application would wait for a configurable number of days before updating the payment plan status as completed.

21. Documentation to be updated: Detailed Design Document, TVC, SAC and Reports User Manuals

## 4 Costs

	Rate*	Estimated Hours	Cost
Project Manager	\$155	178	\$27,590.00
Developer	\$110	1825	\$200,750.00
Lead Developer	\$145	780	\$113,100.00
QA Lead	\$125	320	\$40,000.00
QA	\$105	984	\$103,320.00
Lead Developer/Infra support	\$145	96	\$13,920.00
<b>Total</b>		<b>564</b>	<b>\$498,680.00</b>

\* Note – Rates identified above have been agreed to between CTRMA and Cofiroute USA as per Appendix D of the PBM Agreement

\* Additional: Optional Item 1, specific to NETRMA only: Configuration to allow for customers to be excluded from the Registration

Hold based upon their county using the ZIPFOURce interface to determine the county where registered.

	Rate*	Estimated Hours	Cost
Developer	\$110	56	\$6,160.00
QA	\$105	14	\$1,470.00
<b>Total</b>		<b>70</b>	<b>\$7,630.00</b>

### 4.1 PAYMENT MILESTONES

Milestone	Amount	Date
Notice to Proceed	10%	NTP Date
Design Approved	10%	Per Project Schedule
Development Completed	30%	Per Project Schedule
Testing Approved	20%	Per Project Schedule
User Manual Updates and Training	10%	Per Project Schedule
Go Live	20%	Per Project Schedule

**Total Cost, including optional Item 1: \$506,310.00**

**Estimated time to completion: 20 weeks from NTP**

## 5 Acronyms and Definitions

<b>BOS</b>	Back Office System
<b>BR</b>	Business Requirement
<b>CSC</b>	Customer Service Center
<b>CTRMA</b>	Central Texas Regional Mobility Authority
<b>CUSA</b>	Cofiroute USA
<b>DDD</b>	Detailed Design Document
<b>FAT</b>	Factory Acceptance Test
<b>HV</b>	Habitual Violator
<b>NETRMA</b>	North East Texas Regional Mobility Authority
<b>NTP</b>	Notice to Proceed
<b>PBM</b>	Pay By Mail
<b>PP</b>	Payment Plan
<b>QA</b>	Quality Assurance
<b>QC</b>	Quality Control
<b>Vendor</b>	Cofiroute USA

## 6 Final Approvals

\_\_\_\_\_  
*CTRMA Representative*

\_\_\_\_\_  
*Date*

\_\_\_\_\_  
*Cofiroute USA Representative*

\_\_\_\_\_  
*Date*