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February 2003

The County Council and County Executive
of Prince George's County, Maryland

We have conducted a performance audit of the

**POLICE DEPARTMENT'S FALSE ALARM REDUCTION UNIT AND
RED LIGHT ENFORCEMENT PROGRAM**

in accordance with the requirements of Article III, Section 313, of the Charter for Prince George's County, Maryland. Our report is submitted herewith. The scope of the audit and our findings, comments, and recommendations are detailed in the report, which begins on the following page.

Successful implementation of some of the recommendations will require action by the Police Chief. Implementation of others will require the cooperation of agencies whose activities affect those of the Police Department.

We have discussed the contents of this report with appropriate personnel of the Police Department, and wish to express our sincere gratitude to them for the cooperation and assistance extended to us during the course of this engagement.

David H. Van Dyke, CPA
County Auditor

Lawrence E. Cain, Jr.
Staff Auditor

POLICE DEPARTMENT

SUMMARY OF PERFORMANCE AUDIT

FEBRUARY 2003

The Office of Audits and County Charter. Our audit included reviewing activities of the False Alarm Reduction Unit to ensure compliance with County laws and procedures. We also examined Investigations performed an audit of the Police Department in accordance with the the post implementation of the False Alarm Reduction Unit's CryWolf software to determine if it was functioning properly and complied with contract specifications. We reviewed the Red Light Enforcement Program process, program monitoring, goals and objectives, and maintenance of the cameras and sites. We reviewed the current internal controls governing the cash receipts process for the False Alarm Reduction Unit and the Red Light Enforcement Program. The major areas addressed in our report are:

False Alarm Reduction Unit

- False alarm re-certification and system upgrade requirement letters should be issued and related fees collected in a timely manner.
- False alarm cash receipts need to be reconciled and verified.
- False alarm procedures should be revised and strengthened regarding repeat offenders.
- Various options should be considered regarding collections of delinquent false alarm accounts.
- OITC should test the accuracy of CryWolf record counts and develop a method to verify that the CryWolf software processes all records extracted and transferred to it for processing.

Red Light Enforcement Program

- Red Light Enforcement Unit (RLEU) establish and request from the contractor a list of statistical reports that they require to adequately monitor the program; and provide the County with the capability to review and retrieve data from the TIMS database.
- Program statistical report from the contractor should reflect accurate numbers.
- RLEU should establish goals for the various Program statistical data.

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- Policy on outstanding tickets for out-of-state residents needs to be reviewed to determine other steps to collect outstanding fines including establishing reciprocal agreements with other states.
- Courier should transmit monies received at the RLEU to the processing bank on a daily basis.
- RLEU verify amounts forwarded to the processing bank with the Production Control Processing Form.

We wish to thank the Police Department for its assistance and cooperation. We are available to provide assistance in implementing the recommendations contained in this report, or in any other area where the agency may have concerns.

CHAPTER 1

FALSE ALARM REDUCTION UNIT

INTRODUCTION AND SCOPE

The Prince George's County False Alarm Reduction Unit (FARU) is responsible for tracking all false alarms, issuing alarm user permits, licensing alarm companies, and establishing standards for alarm installation and equipment within the County. Alarm users are allowed three false alarms in a 12-month period. Alarm users who have more than three false alarms are subject to various fines and fees. All alarm users, and installation and monitoring companies, must be registered with the FARU.

The FARU is comprised of three permanent staff members, the director and two permit specialists. In calendar years 2000 and 2001, the FARU received 70,650 and 64,724 false alarms, respectively. The FARU collected \$843,047 in alarm related fines and fees in calendar year 2001.

In the fall of calendar year 2001, the FARU purchased a new software package titled CryWolf. The new software package offers more report options and is more efficient than its predecessor (an in-house alarm tracking and billing system). CryWolf was implemented in December 2001.

We completed a follow-up review on our performance audit report on the FARU, dated February 2000. Our follow-up was based on 14 of the original 15 recommendations.

Our review included examining the false alarm notification process to ensure compliance with County laws and procedures. We reviewed the current internal controls governing the cash receipts process and determined if cash receipts were deposited timely. We also examined the

post implementation of CryWolf to determine if it was functioning properly and complied with contract specifications.

FINDINGS, COMMENTS, AND RECOMMENDATIONS

Enforcement of County Code

In accordance with the Prince George's County Code, Subtitle 9, the FARU is authorized to issue false alarm notifications and collect the related fines and fees. No fine is issued for the first three false alarms. A \$50 fine is issued for the fourth through sixth false alarms. A \$100 fine is issued for the seventh through ninth false alarms. An alarm system re-certification requirement letter and \$25 fee is issued for the sixth or more false alarms. A \$150 fine is issued for false alarm numbers ten through twelve. An additional fee of \$50 and a system upgrade requirement letter is issued for twelve or more false alarms. A \$200 fine is issued for false alarm numbers thirteen and higher.

During our audit, we determined that the FARU is not issuing system re-certification requirement letters or collecting the related fees from alarm users that reached six false alarms. As well, we determined that the FARU is not issuing system upgrade requirement letters or collecting the related fees from alarm users who reached twelve false alarms. The letters were not issued due to the inefficiency of the former system. During our previous audit on the FARU, issued February 2000, we learned that the FARU did not consistently issue letters because the prior system did not generate letters automatically. FARU staff manually tracked and issued letters when time permitted. Prior to and after the implementation of the new system, the FARU was not issuing letters until the new system was upgraded with current information on all alarm users. An undeterminable amount of revenue has been lost due to non-issuance of the letters.

Recommendations

- 1. The Director of the FARU ensure that re-certification requirement letters are immediately issued to alarm users reaching six or more false alarms in a year, and that the related fees are collected in a timely manner.**
- 2. The Director of the FARU ensure that system upgrade requirement letters are immediately issued to alarm users reaching twelve or more false alarms in a year, and that the related fees are collected in a timely manner.**

Appeals of Fines and Fees

According to the County Code, an alarm user has the right to appeal a false alarm notice by submitting an explanation in writing to the FARU. According to the County Code, alarm users have ten days from the date of the false alarm notice to submit the appeal. However, the FARU provides an additional grace period of seven days.

A review of the FARU appeal process revealed that 80% of the appeals were received and processed by the FARU within seventeen days of false alarm notification. The remaining 20% of appeals were processed in excess of seventeen days.

Recommendation

- 3. The Director of the FARU ensure that only appeals received within seventeen days of the false alarm notification are processed for consideration.**

Fine and Fee Collections

Currently, the FARU utilizes the lock box services of Bank of America to collect and deposit all of it's fines and fees. Records of monies received and deposited are forwarded to the FARU. Occasionally, the FARU receives payments directly from alarm users. Monies received at the FARU are forwarded to the lock box service for processing. County Administrative Procedure 346 requires collections in excess of \$100 to be deposited daily and collections of \$100 or less to be deposited weekly.

During our audit, we noted that the FARU does not verify or reconcile the payment records from the lock box service to what payments the FARU staff entered into the CryWolf system. Also, the FARU does not reconcile payment records/deposits to bank statements. As well, the FARU does not comply with Administrative Procedure 346 that requires that all collections in excess of \$100 be deposited on a daily basis. We learned that payments received at the FARU were being forwarded to the lock box service only twice a week while the amount of monies received daily was over \$100.

Recommendation

- 4. The Director of the FARU strengthen cash collection and receipt procedures by reconciling and verifying lock box payments and deposits; and ensure that the Unit is in compliance with Administrative Procedure 346.**

We examined the FARU's aging report and determined that as of December 16, 2002, approximately \$417,827 in fines and fees was still outstanding, which is significant. Although, the County Code does allow for repeat offenders to be refused police response, this rule is not being exercised by the County Police Department. Therefore, the FARU should take further steps to ensure that alarm users comply with County laws and subsequently pay the fines and fees outstanding.

Recommendations

- 5. The Police Chief, in cooperation with the Director of Public Safety, review and strengthen policies within the FARU regarding repeat offenders of the false alarm laws, and require those alarm users to attend educational programs.**
- 6. The Police Chief consider strengthening the collection of delinquent accounts by hiring a collection agency, rolling delinquent accounts over into a property tax lien, and issuing criminal citations.**

The False Alarm Tracking and Billing System

The CryWolf false alarm tracking and billing software processes data that is extracted from the County's Computer Aided Dispatch (CAD) system (designed primarily to notify emergency personnel of the need for services). The CAD system records information about all calls for service and their outcomes. CAD system-generated information about calls received from commercial and residential alarm systems is transferred to the County's mainframe computer, where the records of those calls that are alarms are extracted. The extracted records are then electronically transferred to the CryWolf System for use by the FARU.

During our audit, we evaluated the record extraction and transfer processes, and tested the accuracy of the output for three days in mid-February 2002. We found that the output was sometimes unreliable.

Record extractions covering the 24-hour period from midnight of one day to midnight of the next were being routinely completed at 2:00 a.m., only two hours after the last call for service may have been received. Because the extraction process captures only alarm records that have been closed-out by the police officers responding to the calls, it does not identify for extraction any call for service that may actually have been an alarm but for which the responding officer(s) had not yet provided information about its final disposition by 2:00 a.m. (The following day's extract would not capture such an incident from the previous day, since each extract identifies only calls for service received within the aforementioned 24-hour period immediately preceding the extract run-time.) For two of the three days covered by our test, we found discrepancies between the number of alarms, which actually occurred, and those that had been extracted for processing by the FARU. The difference for each day was two and three, respectively.

We brought this problem to the attention of a software manager of the County's contractor for data processing services, who changed the schedule for the extract process to 6:00 a.m., and stated that this action should preclude future discrepancies of this kind. However, because the change was subsequent to our review, we did not conduct additional tests to verify that the extracts processed after the change are accurate.

FARU should ensure that the action taken has fully eliminated the problem we found, and that any similar discrepancies that may arise in the future are readily identified and resolved.

Recommendation

7. The Director of the FARU request the Office of Information Technology and Communications to direct the County's contractor for data processing services to develop a process for verifying that all records of false alarms are extracted and transferred for use by the FARU.

Once the records of false alarms for a 24-hour period have been extracted and transferred for use by the FARU, the CryWolf software counts the records that had been transferred and displays the number on-screen. This alerts the FARU staff of how many records are awaiting processing for the respective 24-hour period.

For the three days we tested, we found that the number displayed did not match the actual number of records that had been extracted. (For each of the three days the difference was one.) According to a representative of the CryWolf software vendor, the differences resulted from the CryWolf software counting the number of "carriage returns" instead of the number of lines of information. Subsequent to our test work, the vendor modified the software to change the way it counts the records, and gave an upgraded version of the software to the FARU. This action should have corrected the problem we identified, however, we did not conduct further tests to verify this.

Recommendation

- 8. The Director of the FARU request the Office of Information Technology and Communications to direct the County's contractor for data processing services to periodically test the accuracy of the CryWolf software's count of records to be processed, and to take corrective action in the event inaccuracies are identified.**

The CryWolf software automatically generates correspondence to alarm users, as well as, provides various information and summary reports for use by the FARU staff. We noted that there is no mechanism for comparison of the number of records the software has automatically processed to the previously displayed number of records transferred and awaiting processing. Consequently, the FARU staff cannot verify that the software has produced all of the correspondence and other output that it should have produced.

Recommendation

- 9. The Director of the FARU request the Office of Information Technology and Communications to direct the County's contractor for data processing services to develop a method to verify that the CryWolf software actually processes all of the records extracted and transferred to it for processing.**

Alarm Tracking and Billing System Development Life Cycle

As noted in the introduction to this chapter, the Police Department began using CryWolf in December 2001. During our audit, we reviewed the procurement steps taken by the Police Department at the time the software was acquired.

In accordance with Administrative Procedures 111 and 614, the Office of Information Technology and Communications (OITC) must approve all computer-related hardware and software purchases. To ensure that OITC is made aware of all plans to acquire such items and is given an opportunity to evaluate the appropriateness and suitability of the products contemplated for purchase, the County's Procurement Guide (an October 1994 manual prepared by the Office

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of Central Services) requires agencies to specially code such requisitions with the number "111" to designate OITC in the requisition approval path.

We found that the Police Department had failed to use the "111" code in its requisition for the new alarm tracking and billing system, and consequently, OITC did not become involved with the system until after it was acquired and was being installed.

All future Police Department purchases of data processing-related hardware and software should be subjected to the OITC approval process.

Recommendation

10. The Police Chief ensure that his staff adhere to procedural requirements for coding requisitions to designate the Office of Information Technology and Communications in the requisition approval path.

CHAPTER 2

RED LIGHT ENFORCEMENT PROGRAM

INTRODUCTION AND SCOPE

The County instituted the Red Light Enforcement Program (Program) in April 2000 under the authority of the Maryland Vehicle Law, Transportation Article 21-202.1 and the County Code, Subtitle 26, Vehicles and Traffic. The County currently has twenty camera units at various locations throughout the County, primarily on major highways where there have been chronic red light running problems endangering both pedestrian and vehicular traffic. The Police Department's Red Light Enforcement Unit (RLEU) is responsible for managing and processing red light camera citations. The Program is administered by a County contractor, Affiliated Computer Services, Inc. (ACS). ACS is also responsible for maintaining the camera equipment and camera sites.

As part of the Program, photographs are taken of the license plate of vehicles running a red light and a citation is mailed to the owner of the vehicle. The violation is a civil citation with a \$75 fine. The owner has thirty days to pay the citation or can request a hearing in District Court. If the owner does not pay the citation or request a hearing, a second notice is sent. If the owner takes no action within thirty days, the Maryland Department of Motor Vehicles (DMV) is notified and a flag or indicator is attached to the vehicle's registration. The owner must pay the fine before he/she can renew the vehicle's registration. At this point in time, flags cannot be placed on out-of-state registrations.

Since the beginning of the Program, 87,255 citations have been issued over 32 months and \$4.5 million in fines have been paid. Approximately 83.0% of the citations are issued to

Maryland residents. Approximately 23,521 citations are outstanding, equating to \$1,764,075 in fines.

During the audit, we reviewed the Program process, monitoring, goals and objectives, internal controls over payments, and maintenance of the cameras and sites.

FINDINGS, COMMENTS AND RECOMMENDATIONS

Citation Process

Each day an ACS technician retrieves film from the cameras. The film is developed daily, digitized and reviewed by an ACS verifier to determine if each event was a violation. Some events may be omitted if the vehicle didn't pass over the stop line, turned right on red, or was an emergency vehicle. Vehicles without license plates or unreadable license plates are omitted. An event is omitted if no speed is recorded on the film, the film is overexposed, or there are errors in the photo data box. The citation can also be omitted if the vehicle was in a funeral or was directed by a police officer. The remaining valid events are assigned a citation number and become possible violations. These citations are sent to the RLEU to obtain information on the owner of the vehicle. The owner information is obtained by the RLEU and is sent back to ACS and reviewed to ensure that the vehicle owner information matches the vehicle in the photo. The citation is again reviewed to ensure that there was a violation. These citations are then sent to the RLEU for final review and approval for issuance of the ticket. All tickets must be issued within 14 days of the event date.

All data regarding each event and citation is maintained in ACSs computer system called the Ticket Information Management System (TIMS). A monthly statistical report is sent to the RLEU which lists the number of events, non-citable events, possible violations, number of violations with unavailable owner information, citations past the 14-day time requirement,

tickets mailed, tickets paid, tickets open and other data/information maintained on the TIMS. A report that lists the number of violations by speed increments, a report that lists the number of violations by time of day increments, and a report listing the number of violations by state is also sent to the RLEU.

According to discussions with RLEU staff and based on our observations, reports such as flagging/unflagging tags report, court report by disposition and site, exception report, change report, maintenance report, and priority day report (to monitor violations so that they are issued within the 14 day requirement) would enable the RLEU to more effectively monitor Program goals and contractor compliance. These specific reports would need to be requested from ACS.

Recommendation

1. The Director of the RLEU establish a list of statistical reports that they require to adequately monitor the program and request the contractor to provide these on a periodic basis as needed.

During our audit, we learned that the RLEUs access to the Program system and data is limited to read-only. The RLEU can review possible violations for tickets and change the status of a violation such as suspending a citation because it does not meet requirements or the tag is not clear enough, however, the RLEU cannot pull data randomly for review or monitoring purposes. They can only pull information regarding a specific ticket number, tag number, name or address. They cannot pull tickets by type of suspense code, date range, location, etcetera. This type of information must be requested of ACS so that they can program the system to pull data by the specific parameter. The RLEU needs access to Program data so that they can effectively monitor and manage the Program.

Recommendation

2. The Director of the RLEU request the contractor to provide the County with the capability to review and retrieve data from the TIMS database.

We found from our review of the monthly statistical report that the calculations for the number of tickets paid and the number of tickets outstanding for the contract period is incorrect. Mathematical formulas (calculations) are wrong and numbers are incorrect. These numbers do not represent the accurate number of tickets paid each month and the number of overall tickets outstanding since the contract began in April 2000. The report generated does not use a number that is cumulative of all payments. The RLEU does not receive a monthly revenue report, or a report that lists total number of tickets paid in a given month or the number of tickets still outstanding. Again, this information is necessary so that the RLEU can effectively monitor and manage the Program.

Recommendation

3. The Director of the RLEU ensure the statistical report received from the contractor is corrected to reflect accurate numbers.

The RLEUs overall goals are to reduce the number of red light runners and reduce the number of accidents. From our review of the statistics, it appears that the number of red light runners has reduced and stabilized over the contract period even though the number of camera sites has increased. The RLEU also receives an accident report from the State Police who maintain statewide accident statistics. However, the report only lists the top ten accident sites in the County and may or may not include the locations where the cameras are located. Therefore, it is difficult for the RLEU to determine if the cameras are reducing the number of accidents at these sites. The RLEU has requested specific reports for the camera sites from the State in the past but has not received them.

Recommendation

4. The Director of the RLEU obtain accident data for comparison purposes to determine if number of accidents have been reduced at camera sites.

The RLEU does perform a month-to-month comparison of statistics to determine any deviations in activities from month to month. We learned that the RLEU has no goals, standards, or guidelines relating to the various statistical data they receive to measure, monitor and manage the Program activities. These types of benchmarks provide specific ranges or levels of accomplishment. Any variances from these benchmarks are a flag for management to investigate differences.

The Program has been in effect for a sufficient period so that the RLEU could establish benchmarks with acceptable limits or thresholds for certain statistics to monitor the Program activities. For example, limits could be set for i) the number of violations that don't meet the 14-day mailing requirement, ii) the number of verified rejects by the RLEU (a flag that the contractor may not be satisfactorily reviewing violations), and iii) maintaining the number of tickets dismissed/suspended. Establishing benchmarks or acceptable/unacceptable limits for various statistics would enable the RLEU to more closely monitor and evaluate Program performance.

Recommendation

- 5. The Director of the RLEU establish goals for the various statistical data they receive regarding the program, such as number of non-citable violations, number of violations not mailed within the 14-day requirement, and other relevant statistical data categories.**

During our audit, we reviewed tickets that were suspended for poor image and noted suspensions should not have been made in some instances. We also found that some tag numbers were incorrectly entered and never corrected.

According to our review of statistical reports, we noted a significant increase in the number of violations that were in the "time expired" suspend category (not issued within the 14-day requirement). Discussions with ACS staff revealed that many of these violations were coded

as "time expired," but should have been coded in the "no hits" or "clarity of plate" suspend categories. ACS staff also stated that at that time, others in the "time expired" suspend category were coded correctly as "time expired," however, it was learned that many were suspended on the 14th day versus after 14 days. Therefore, some tickets were incorrectly suspended. (We were informed that this issue was corrected.) The RLEU does not receive reports by suspend code from ACS. These reports would be beneficial for monitoring and review purposes.

Recommendation

6. The Director of the RLEU request the contractor to provide on a regularly scheduled basis reports for various suspend codes and a report for those tickets that were suspended due to not meeting the 14-day requirement. These reports should be reviewed to ensure that the tickets were accurately coded. Inaccuracies should be brought to the attention of the contractor and corrected.

As a result of our review of the process for outstanding tickets, we determined the RLEU has a significant number of outstanding tickets for out-of-state residents. Out-of-state license tags comprise approximately 17.0% of the overall total citations issued. As of November 30, 2002, 6,222, or 42.4%, of the tickets issued to out-of-state residents were outstanding, totaling \$466,650. The County sends these individuals two notices. If a payment is not received after the second notice, no further action is taken to collect the payments. The County does not have reciprocal agreements with other states, including Washington D.C., and cannot flag these tags. The Police Department should pursue establishing reciprocal agreements with other states and consider other options to collect these outstanding tickets. If reciprocal agreements cannot be established and other options developed, the County should consider writing off these outstanding tickets.

Recommendation

- 7. The Police Chief review the policy on outstanding tickets for out-of-state residents and determine what other steps should be taken to collect these outstanding fines. This could include establishing reciprocal agreements with other states, and determining if a policy should be established to close these tickets after a certain period of time.**

Processing Payments

Red light violation tickets can be paid at a post office box or at the RLEU. Payments (checks and money orders) mailed to the post office box are picked up by a bonded courier and delivered to a bank (processing bank) subcontracted by ACS. The processing bank credits each applicable ticket as paid and monies are deposited each day into the County's account. Weekly, the RLEU receives copies of the deposit slips from the contractor. The RLEU completes a County Transmittal Report and forwards it along with the deposit slip to the County's Treasury Division. The RLEU keeps a copy of the deposit slip and Transmittal Report for their records.

Payments (money orders only) made at the RLEU are recorded in a receipt book. Receipts are pre-numbered with one copy to the payee, one for the RLEU's records, and one attached to the citation. Each payment is recorded on the RLEU's Payment Transmittal Record form. A bonded courier picks up payments once or twice a week and delivers the payments to the processing bank. At the end of the month, more payments are received in order to clear flagged tags, therefore, the courier picks up payments daily. The RLEU uses a summary page of the Payment Transmittal Record form to record total amounts given to the courier. The courier must sign the form upon picking up monies from the RLEU. The processing bank staff must also sign the form when they receive monies. The RLEU makes a copy of the summary form for the courier, one is included with the payments, and one is for their records. The RLEU faxes a copy of the summary form to ACS.

From our review of the payment process, we found that the RLEU does not deposit money through the courier to the processing bank on a daily basis. The courier picks up money twice a week. County Administrative Procedure 346 requires that money received over \$100 in a day should be deposited that day. According to our observations, the RLEU collects over \$100 a day.

Recommendation

8. The Director of the RLEU make arrangements to have the courier transmit monies received at the RLEU to the processing bank on a daily basis.

The Payment Transmittal Report form used by RLEU to transmit money to the processing bank (which shows amount of monies transmitted) is not maintained by the processing bank. The form should be maintained for recordation purposes to verify the amount of money the bank signed for from the courier.

We found that the County does not receive a copy of the validated deposit slip from the County's bank nor any type of bank receipt. The RLEU only receives a non-validated copy of the deposit slip from the processing bank via ACS.

Recommendations

9. The Director of the RLEU request the processing bank to return the signed Payment Transmittal Record form that the RLEU sends to the processing bank back to the RLEU.

10. The Director of the RLEU request the contractor to send the RLEU the validated copy of the deposit slip or make arrangements for the RLEU to receive a bank receipt from the County's bank.

We learned that at one time, the RLEU received an On-Line Cashiering Report (Report) from the contractor that listed each individual payment processed by the processing bank. The payments include those made at the RLEU and through the post office box. The RLEU no longer receives this Report. The Report was used by the RLEU to ensure payments made at the

RLEU were recorded in the system and to determine what should have been deposited from day to day.

Recommendation

11. The Director of the RLEU request the contractor to forward the On-Line Cashiering Report and the RLEU verify that payments were properly recorded.

We found that information received from ACS regarding monies sent to the processing bank from the RLEU is insufficient for the RLEU to ensure that monies sent were deposited. Payments from the RLEU and the post office box are recorded on the same deposit slip, thus making it difficult to verify that all payments from the RLEU were deposited. As of the end of calendar year 2002, the RLEU started to receive from ACS a batch report called Production Control Processing Form (Form). According to discussions with processing bank staff, payments from the RLEU are now backdated to the date the RLEU received the payments and recorded in batch number series. The Julian date of the batch on the Form can be used to reflect total payments sent by RLEU. The RLEU staff stated this should be sufficient to verify that monies were processed and deposited.

Recommendation

12. The Director of the RLEU verify amounts forwarded to the processing bank with the Production Control Processing Form.

We learned that when checks are returned to the RLEU for insufficient funds, it is difficult at times, when no ticket or citation number is recorded on the check, to determine for which ticket the money applies. This is especially difficult when the name and address on the check is different than the name and address of the vehicle owner to whom the ticket was issued. The processing bank does not always record the ticket number on the checks. If the RLEU

cannot determine which ticket a non-sufficient funds check is applicable to, then the ticket is never paid.

Recommendation

13. The Director of the RLEU request that the processing bank record the ticket/citation number on the check when the name and address on the payment does not match the ticket.