

SECTION 12: QUALITY ASSURANCE (QA)

12.1 SUMMARY

The administrative authority has implemented procedures to identify, correct, and prevent fraud, waste, and abuse. These procedures determine whether emissions testing procedures are adequate, equipment is working correctly, and whether other problems exist which would impede program performance. Performance audits are conducted periodically to evaluate station/inspector compliance to the program regulations. Performance audits may be in the form of overt and covert audits. Other audits conducted include data record audits, equipment audits, and auditor training. In addition to scheduled audits, random audits may be performed based on consumer information and/or database records.

At the conclusion of each audit, auditors complete a formal evaluation of the audit using a form that is retained by the administrative authority. Each evaluation provides sufficient detail to support either an administrative or civil hearing. Overt and covert audit procedures are updated as needed to reflect changes in the program or changes necessary to improve program effectiveness.

12.2 PERFORMANCE AUDITS

Performance audits are conducted on a regular basis to determine whether inspectors are using correct procedures when performing emissions testing. Performance audits may either be overt or covert. Overt audits are typically unannounced inspections where the auditor simply arrives at an inspection station to observe an inspection and to check all the necessary equipment. Covert audits are undercover inspections where the auditor observes an inspection as a customer. In a successful covert audit, the inspector does not suspect the customer as an auditor. A covert audit may also include a remote observation where the auditor observes the station from a distance. A minimum of three overt audits are conducted each year for each station. A minimum of one covert audit is performed annually for each station. Additional performance audits may be conducted for stations employing inspectors suspected of violating regulations as a result of a previous audit, data analysis, or consumer complaint. Performance audit frequency is established in the interagency agreement between the LDEQ and the DPS for this program. This agreement is updated and signed by both agencies annually.

Overt Audits

Overt audits are conducted by the DPS. Stations for audit are selected at random and do not receive notification prior to the audit. During overt audits, auditors observe the skill and competence of inspectors. Proper document security is also observed to ensure that inspection certificates are properly secured. Current station and inspector licenses must be properly displayed. All safety testing equipment must be present. All computer equipment must be connected properly and calibrated. A communication diagnostic test is performed on the station's analyzer to assess whether the station is testing in real-time. After each overt audit, auditors complete a written evaluation detailing the station's overall performance during the audit. The original completed evaluations are filed at the DPS. Copies of audit evaluations are submitted to the LDEQ monthly for review and subsequent filing.

To ensure that overt audits are evenly conducted over the course of the year and for purposes of auditor evaluations, auditors from the LDEQ accompany the DPS auditors while conducting overt audits each month. During these audits, the LDEQ auditors evaluate the DPS auditor to ensure proper QA procedures are followed. Along with auditing the DPS auditors, the LDEQ auditors may also audit the station to ensure that the station is performing inspections properly. Because the DPS auditors complete forms concerning the station audit, the LDEQ auditors complete forms only concerning the auditor's performance but may make any notes regarding the audited station's performance.

Covert Audits

The DPS has responsibility for performing covert audits. A minimum of one covert audit is performed for each public inspection station open throughout the year. The dates and times stations receive a covert audit are selected at random, and stations do not receive notification prior to or during the audit. During covert audits, auditors drive a vehicle into the audited station to receive a full safety and emissions inspection. For this reason, auditors use vehicles normally subject to all safety and emissions testing requirements.

During the covert audit, auditors observe the skill and competence of the inspectors. Inspectors are observed to ensure that a Gas Cap Integrity test is performed, a visual check of emissions components is performed, and an OBD system check is performed during the audit in

addition to all safety component checks. Different vehicles are used by the DPS annually to perform covert audits and prevent detection.

After each covert audit, auditors complete a written evaluation detailing the station's overall performance during the audit. The original completed evaluations are filed at the DPS. Copies of audit evaluations are submitted to the LDEQ monthly for review and subsequent filing. Any violations observed at the audited station are written in a formal report and a copy is delivered to the station. The DPS determines what penalty to issue for each violation observed. Station enforcement is covered in greater detail in the following section, *Enforcement Against Inspection Stations and Inspectors*.

12.3 RECORD AUDITS

The Vehicle Inspection Database (VID) is reviewed or screened monthly to assess station performance and identify problems that may indicate potential inspector fraud or incompetence. Data records are analyzed to identify statistically inconsistent information, testing discrepancies, irregular testing patterns and unusual data entries. If needed, an auditor may visit an inspection station to review records and/or aspects of the inspection process not already covered by the electronic analysis.

Station overt audits cover equipment performance and accounting for inspection stickers. Any lost and/or stolen inspection stickers have to be documented with the DPS. The DPS also documents voided stickers, stickers not used for whatever reason. The DPS keeps a record of all voided safety and emission insert stickers and all lost and/or stolen stickers reported by each station. The Office of Motor Vehicles (OMV) keeps a record of all safety and emission insert stickers bought by each inspection station.

12.4 EQUIPMENT AUDITS

During overt audits, auditors conduct QC evaluations of the required test equipment. Gas cap testing equipment must be properly connected and successfully calibrated. The station analyzer is evaluated to ensure that the most recent version of the inspection software is operating. In addition to emissions equipment being visible and operational, all safety equipment must be visible and operational.

12.5 AUDITOR TRAINING AND PROFICIENCY

Auditors for both the DPS and the LDEQ are formally trained and knowledgeable in:

- the use of analyzers and other emissions testing equipment;
- the program rules and regulations;
- the basics of air pollution control;
- the basic principals of motor vehicle engine repair, related to emissions performance;
- emission control systems;
- state administrative procedures;
- QA practices;
- covert audit practices; and
- evidence gathering.

The DPS auditors and contract technicians are both audited by the LDEQ staff. Auditors and contract technicians are audited at least once annually.