



# City of Providence Municipal Court Internal Control Assessment

# Findings and Recommendations Internal Audit Report

#### December 2023 – Final Report

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## **Project Overview**

#### A. Background

The City of Providence, Rhode Island engaged CliftonLarsonAllen LLP (hereinafter referred to as "CLA") to provide internal audit services related to the processes and controls associated with the City's Municipal Court operations (hereinafter referred to as the "Court"). This review included an assessment of the process of issuing and tracking parking, moving, redlight, and general violations, as well as the Court cashiering procedures.

#### B. Project Approach and Tasks

This assessment included the following project tasks/activities:

- 1. Information gathering through interviews with key personnel
- 2. Review associated policies, procedures or process documents for parking tickets, overnight parking, general violation payments and cashiering practices
- 3. Review and analysis of processes, including:
  - a. Confirm parking tickets, overnight parking, general violation payments and cashiering processes in comparison to the Municipal Court documented standard processes
  - b. Confirm environmental and criminal matters (non-observed) within Municipal Court
  - c. Confirm how payments are tracked and allocated to the appropriate originating source
  - d. Confirm the controls in place to manage and administer payments
  - e. Confirm the daily/monthly/annual reconciliation processes for transactions associated with parking tickets, overnight parking, general violation payments and cashiering
- 4. Identify staff roles and responsibilities within the Court's operations
  - a. Review and confirm the segregation of duties of financial transactions
  - b. Identify any control weaknesses and/or duplicated efforts
- 5. Review usage of technologies to oversee and manage parking tickets, overnight parking, general violation payments and cashiering
- 6. Test Court financial transactions for parking tickets, overnight parking and general violation payments
- 7. Provide management with a report of findings and recommendations, including best practices for the Municipal Court
- 8. Meet with management to review the results of the report

#### C. Acknowledgements

CLA would like to thank the Providence Municipal Court for their participation, support, on-going dialogue, and feedback during this internal audit.



## **Municipal Court Violation and Payment Overview**

Below is a description of the processes related to violation and payments at the City of Providence's Municipal Court.

- 1. Municipal Court Policies and Procedures
  - a. CLA requested all policies and procedures documentation that the Municipal Court had related to their overall operations and processes. CLA received the following two documents:
    - i. Daily Processing and Balancing Procedures for Municipal Court
      - 1. This one-page document provided limited standard processes and procedures for the employees of Municipal Court to follow.
    - ii. Traffic Tribunal Rules of Procedure
      - 1. This 20-page document was last updated on June 8, 2015

#### 2. Technology System and Tools

- a. The Court utilizes the Conduent eTIMS software system (hereinafter referred to as eTIMS) for processes related to documenting\tracking violations and payments:
  - i. eTIMS Online Ticket Payment System
    - 1. It was noted during our interviews that violations are entered into eTIMS by the Court staff or parking enforcement.
    - 2. It was noted during out interviews that Court decisions regarding violations are entered and tracked in eTIMS by the Court Clerks.
    - 3. It was noted during testing that online payments are done within eTIMS, and other payments (ex. in person, via mail) are entered into the system by the Court Clerks.
- b. CLA requested a number of reports from Conduent to validate users access, security settings within the software system and Service Organizational Controls (SOC) (security) audit report.
  - 1. After several attempts and many weeks (4-6) waiting to obtain these reports, Conduent was not able to provide the reports requested.
    - The project team reached out to the Senior Program Manager from Conduent and requested this information via a phone call and email requests
    - Based on a conversation with the same Senior Program Manager representative at Conduent, the project team confirmed that Conduent did not have an independent security audit (SOC attestation) of the eTIMS software solution

#### 3. Municipal Court Staff

- a. The following personnel of the Court are associated with violation and payment procedures:
  - i. Court Administrator oversees the Court's daily operations, handles reconciliations (daily, monthly yearly), transfers daily reports to the Controller's office and handles deposits of payments.
  - ii. Deputy Court Clerk/Deputy Court Administrator in charge of collecting moving violation tickets from the Police, entering written ticket information into eTIMS, validating eCitation tickets through NCIC and supporting payment processing procedures.
  - iii. Court Clerk in charge of assisting customers at the window and over the phone, prepares documentation for court proceedings, issue and enter parking permit information into eTIMS, sit in on court proceedings and enter respective judgments into eTIMS.



iv. Court Clerk II – oversees the recording of Court proceedings, payments for environmental violations and enters environmental violation judgment into eTIMS.

**Please note:** After a portion of this engagement was completed, the original Court Administrator retired, and a new Court Administrator was hired into this position. This individual has started to implement new protocols and make operational changes.

#### 4. Violation Process

- a. The following categories of violations are handled by the Court:
  - i. Environmental Violations (issued by Public Works Officers)
  - ii. Parking Violations (issued via written ticket or eCitation)
  - iii. Moving Violations (issued via written ticket or eCitation)
- b. Once a violation is issued, they are entered into eTIMS by an officer, or given to the Court, and reviewed and entered manually by a member of the Court staff.
- c. Every violation is granted an initial date to appear in Court.
  - i. The individual receiving the violation has an option to pay the ticket through eTIMS, in person and via mail, or to appear during the allotted initial Court date.
- d. If the individual who was issued the violation chooses to appear in Court, they make an initial plea of "guilty" or "not guilty."
  - i. For "guilty" pleas, the Judge has the discretion to determine the payment amount and terms, which is entered into eTIMS by the Court Clerk.
  - ii. For "not guilty" pleas, a trial date is set and entered into eTIMS by the Court Clerk.
- e. During the trial, the Judge has the discretion of making the final verdict on whether the individual is "guilty" or "not guilty."
  - i. For "guilty" judgment, the Judge has the discretion to determine the payment amount and terms, which is entered into eTIMS by the Court Clerk.
  - ii. For "not guilty" judgment, the respective violation is dismissed and adjustment in eTIMS by the Court Clerks.

#### NOTE: A diagram of the process workflows can be found in Appendix A

#### 5. Parking Permit Process

- a. The City of Providence provides an option for issuing overnight parking permits for the hours of 2 A.M to 5 A.M.
- b. Permits must be purchased through the Court or the Traffic Engineering department.
  - i. The Court is in charge of in person payments, while the Traffic Engineering is in charge of handling online payments.
  - ii. Permits are \$100 for residents and \$200 for non-residents.
- c. Permits are entered into eTIMS by the Court or the Traffic Engineering.

#### NOTE: Process workflow can be found in Appendix B

#### 6. Payment and Deposit Process

a. The following types of payments are handled by the Court:



- i. Violation payments via online credit card, mail, or in person
- ii. Overnight permit payments in person
- b. Once payments are received by the Court, payment information is reviewed by the Court Clerks and entered into eTIMS.
- c. Payments are reconciled on at least a daily basis and signed off on by the Clerk responsible.
- d. Daily reports are given to the Court Administrator, who approves the daily reconciliation.
- e. The Court Administrator takes the cash, checks and money orders into the vault.
- f. The Court Administrator deposits cash, checks and money orders every day.
- g. Deposit slips and daily reports are retained by the Court and turned into the Controller's office about once every two weeks.

NOTE: Process workflow can be found in Appendix B

## **Municipal Court Control Findings and Recommendations**

Below are CLA's findings and recommendations related to the Municipal Court's processes, operations, technology and policies.

- Finding eTIMS Customer Service personnel changed\modified transactions (Critical\High Risk)
  - a. CLA reviewed a number of transactions onscreen within the Conduent eTIMS system. Based on this assessment, we determined that the user access report provided to the Municipal Court was inaccurate. In fact, there were user IDs identified with numerous Court transactions that were not associated with City employees.
  - b. As part of this review and based on other information, the Court found out that eTIMS Customer Service users had the ability (and did) go into the system and make changes to records without the permission of the Municipal Court. This could significantly impact the integrity and accuracy of Municipal Court information.
    - i. Through testing violations and payments, it was discovered that eTIMS made changes to comments within one instance of a violation.
    - ii. Per discussion with the Deputy Clerks, eTIMS Customer Service personnel have the ability to make changes to various aspects of a violation within the system.
    - iii. CLA characterizes this situation coupled with the other eTIMS issues as a **Significant Weakness**.

# 1. **Recommendation** – Reach out to eTIMS to eliminate the Customer Service personnel's ability to access and\or modify transactions

- a. Based on discussions with the Municipal Cout Administrator, once it was identified that eTIMS was modifying transactions and also providing advice to people that called the Customer Service, the Court Administrator requested eTIMS to immediately stop changing transactions and discontinued servicing citizen calls.
  - i. In July 2023, the Municipal Court Administrator requested for the eTIMS Customer Service to no longer have access to the Court's data or have the ability to publish notes in the system. It is unclear if eTIMS has fully implemented this request.
  - ii. Based on the situation as identified above, the Municipal Court Administrator should request a new "user access" report from Conduent regarding access to the eTIMS software system. The Municipal Court Administrator should validate that no users outside of Municipal Court, have the ability to make changes to the eTIMS system

#### Finding – Limited ability to accurately confirm eTIMS user access and software capabilities (High Risk)

a. CLA requested several reports from the eTIMS vendor to identify all the users that had access to the eTIMS system and what functional capabilities each person had within the software. In particular, CLA wanted to verify that only Municipal Court employees had access to eTIMS, and out of these individuals, only selected personnel could change\modify violations and their respective fees.



- b. eTIMS was able to provide a report that listed out City of Providence employees. However, the report identified the following:
  - i. One person who had resigned from the Municipal Court was still an active user
  - ii. There were two police officers that had access to eTIMS
  - iii. There were two individuals associated with Environmental Specialists
  - iv. There were multiple instances where a user had multiple user IDs
- c. The eTIMS vendor was unable to provide a report that confirmed the functional capabilities of Municipal Court employees. Presently, the Court has no confirmation as to which users have administrator privileges, ability to modify violation information or limited software access.

# 2. **Recommendation** – Meet with the eTIMS vendor onsite to review user access and user software capabilities

- a. The Municipal Court Administrator should request a meeting with the eTIMS vendor to review\evaluate user access within the eTIMS software application. At this meeting the eTIMS vendor should:
  - i. Immediate remove users that should not have access to the eTIMS system
  - ii. Validate and update as necessary the functional capabilities of each Municipal Court employee.
  - iii. Validate and confirm which users have administrative capabilities to the eTIMS system
  - iv. Determine the best way to monitor user access and capabilities within the system.
- Finding Functionality and capabilities of the Conduent's eTIMS software does not meet the Municipal Court's standards and\or State of Rhode Island Municipal Court requirements (High Risk)
  - a. Based on interviews with the Municipal Court's Court Administrator and other employees, there are significant gaps in the software capabilities of eTIMS which impact legal notifications to violators and ultimately revenues to the City of Providence. Outlined below are some of our findings.
    - i. The eTIMS system can't generate a number of critical\key reports and\or information that are required by the State of Rhode Island for Municipal Court records, Including:
      - Court disposition and closed case files
      - Clearance for reinstatement
      - Copies of parking tickets are not stored\imaged
      - Final Court disposition reports\sheet are not permanently stored
      - Docket information
      - General reports (not available)
        - ✓ Paid Suspension List
        - ✓ Suspensions sent to Traffic Tribunal
        - ✓ Ticket status
        - ✓ Paid ticket
    - ii. eTIMS cannot provide complete financial information of monies received, monies owed, etc.



- The Court needs an integrated financial solution to properly and accurately generate financial reports
- iii. Problems exist with being able to on-demand view video's related to red-light infractions
  - There have been numerous situations where the Court could no adequately produce videos and as a result could not prosecute a violator
- iv. Conduent can not provide and\or track legal court judgements or case work sheets
- v. Conduent does not provide docketing capabilities that meets the Court's standards to confirm that a person is in default if they did not appear and track both the court judgements and associated fees.
- b. eTIMS uses the National Law Enforcement Telecommunications System (Nlets) for vehicle lookup information instead of the actual Rhode Island Department of Motor Vehicles information database
  - i. Nlets does not provide the most up to date, which may impact receipt of legal notification to vehicle owners
    - Violations are sent to wrong addresses resulting in lack of legal notice to violators along with additional fees\expenses
  - ii. This system does not maintain or track all vehicle plate types used within the State of Rhode Island (e.g. Jitney, public, antique, custom plates).
    - Impact's ability to issue violations which causes loss of revenue for the Court and City
- 3. **Recommendation** Meet with the eTIMS vendor onsite to review software functionality and capabilities
  - a. The Municipal Court Administrator should request a meeting with Conduent to review\evaluate the eTIMS software application and capabilities.
  - b. If this software cannot be re-configured and\or programmed within 3-6 months to meet the needs of Municipal Court, the Court should consider other software solutions

# Finding –eTIMS does not have an independent security assessment or Service Organization Control (SOC) report High Risk

- a. CLA requested a SOC report and\or an independent security assessment report associated with the eTIMS software application and hosted IT environment. The reason for this request is due to the type of information stored within the eTIMS system. There is a lot of confidential information stored within the system including violators name, address, plate number, license number, etc. Since the eTIMS system is a SaaS\Cloud solution, validating the security and integrity of the information is a critical control for the Municipal Court and ultimately the City of Providence.
  - i. A SOC-2 report provides an independent, third-party assessment of security, availability, confidentiality, processing integrity and\or privacy. It demonstrates that an organization maintains a high level of information security. The rigorous compliance requirements, which are put to the test in an on-site audit, ensuring that sensitive information is being handled responsibly.

- 4. Recommendation Request a SOC or independent security assessment be performed
  - a. The Municipal Court should request that eTIMS and the hosting platform have a SOC audit performed. This attestation would confirm and validate that the security and integrity of the Courts data is being met (or not).
    - eTIMS could also elect to have an independent security assessment performed using the NIST CSF standard. Although this assessment is not as in depth as a SOC, it does provide valuable information on the security protocols used by eTIMS.
  - b. If the Municipal Court can't get eTIMS to obtain and independent security assessment within 6 months, the Court should consider looking for other software solutions that meet their functional requirements and meet a higher security standard.
- 5. Finding –Repeated issues exist with the eTIMS vendor software Moderate Risk
  - a. Per discussion with Court staff, it was noted eTIMS frequently experiences issues with freezing and logging users out of the system, resulting in lost data and need for data reentry. Such issues have caused amounts to appear as being paid but will not appear on the cash-out report, resulting in daily report amounts being off balance.
    - i. Through interviews, it was noted that when a Court staff is locked out of their eTIMS account, user IDs and passwords are occasionally shared. According to best practice, Court staff should always use their own, unique user IDs and passwords in order to accurately track employee activities within the system.
    - i. Per discussion with Court staff, eTIMS system issues sometimes result in tickets invalidly being marked as "dismissed," though no changes were made by the Court.
- 5. Recommendation Reach out to eTIMS to and meet with the vendor to validate\resolve issues
  - a. The issues of freezing and logging users out of the system have been going on for quite a while. The Municipal Court has made the eTIMS vendor aware of this issue many times. The Municipal Court should obtain a formal response from the vendor as when this issue will be resolved.
- 6. Finding Limited formally documented and implemented policies and procedures exists Moderate Risk
  - a. Through an information request from the Court Administrator and based on various Court interviews, CLA obtained limited formal documentation that governs how the operational processes of the Court are managed. CLA noted that the Municipal Court does not currently have policies, procedures developed regarding everyday core processes
  - b. Based on discussions with members of the Municipal Court, CLA confirmed that there are also no documented policies and procedures associated with Environmental Court. During the CLA engagement, no official meetings took place, and all procedures were handled privately.

#### 6. Recommendation – Develop and document formal policies, procedures, and protocols

- a. Since there are limited formal documented operational policies, procedures, and in place, the Court should develop comprehensive documentation governing the management of Court operations. The Court should consider formally documenting (but not limited to) the following processes:
  - vi. eTIMS entries (violations, payments, Court decisions)
  - vii. Daily reconciliations
  - viii. Credit card handling
  - ix. End of day processing
  - x. Month end processing
  - xi. Year-end processing
- b. Develop policies, procedures and protocols for Environmental Court. The Court should consider formally documenting (but not limited to) the following processes:
  - i. Policies and procedures associated with Environmental Court
  - ii. Standard public hours for Court operations
  - iii. Any special end of day, month end or year end processes
- 7. **Finding** Lack of documented frequency to transfer daily payment report to Controller Moderate Risk)
  - a. Since there is a lack of formal policies and procedures, there is no requirement to transfer daily payment reports to the Controller's office on a regular basis. Through discussion with the Court Clerk and Court Administrator, daily reports are maintained for two (2) weeks before being given to the Controller's office. This impacts the overall review and control(s) of this daily process.
- Recommendation Increase frequency of transferring daily payment reports to the Controller's office
  - a. As a best practice, daily payment reports should be brought to the Controller's office at least once per week. In fact, the Municipal Court should consider electronically sending the daily payment report to the Controller's office at the end of each business day or the following morning. This will enhance overall controls and confirm daily payments with the Controller's office.

## **Overall Audit Conclusion**

As part of this audit, CLA tested a sample of violations in the system. For each type of ticket (civil, moving, parking and redlight), CLA assessed the control for effectiveness and provided an audit conclusion of "Satisfactory", "Needs Improvement", "Unsatisfactory", or "Inconclusive".

CLA determined an overall audit rating of "Satisfactory". The one exception identified was related to eTIMS system issues and the ability of the vendor to make changes to violation detail in the system.

Audit Conclusion Key						
Conclusion Rating	Rating Calculation/Logic					
Satisfactory	90-100% of the samples selected for testing passed the test criteria with no exceptions					
Needs Improvement	75% - 89% of the samples selected for testing passed the test criteria; exceptions were noted					
Unsatisfactory	74% or less of the samples selected for testing passed the test criteria; exceptions were noted					
Inconclusive	Audit test files and/or supporting documents were not available during testing; unable to conclude on testing results					

## **Violation Information Testing**

CLA performed the following audit tests:

- 1. Violations
  - a. CLA's testing included assessing the violation amount and corresponding payment information provided within eTIMS versus what is formally recorded in the Court's system for a sample of violations during the period January 1, 2022 to December 31, 2022.

Туре	Transaction Population	Transactions Selected	Results 2022
			2022
Civil	238	10	Satisfactory
Moving	2801	15	Satisfactory
Parking	80,581	30	Satisfactory
Red Light	128,484	35	Satisfactory

- b. Based on the number of violations, CLA selected the following samples:
  - i. 10 civil violations were selected out of a population of 238.
  - ii. 15 moving violations were selected out of a population of 2,801.
  - iii. 30 parking violations were selected out of a population of 80,581.
  - iv. 35 red light violations were selected out of a population of 128,484.
- c. CLA made the following determinations based on testing:
  - i. Of the 10 civil violations selected, 10 were a match between eTIMS and Court records.
  - ii. Of the 15 moving violations selected, 10 were a match between eTIMS and Court records.
    - Though the amount of the violations matched in the system, it was noted that one (1) of the selections contained unauthorized edits by eTIMS.
  - iii. Of the 30 parking violations selected, 30 were a match between eTIMS and Court records.
  - iv. Of the 35 red light violations selected, 35 were a match between eTIMS and Court records.

### Management Comments

CLA obtained management comments from the City of Providence Municipal Court in response to the findings and recommendations.

1. **Recommendation** – Reach out to eTIMS to eliminate the Customer Service personnel's ability to access and\or modify transactions

#### Management Comments:

The issues from this service range from Conduent customer service agents presenting themselves as City of Providence employees to arguing with constituents to offering legal advice and more. After receiving numerous complaints from constituents, the Court Administrator reached out to Conduent's account executive assigned to the contract (Reese Blahuta). The objective was to sample previously recorded calls but the Court was informed these calls are not recorded and there is no access to review any call. The Court Administrator called in to customer service to see what the experience entailed and was refused escalation when a supervisor was requested. The customer service agent refused to give any identifying information to reference the agent in a complaint and insisted they were a City of Providence employee. One of the most concerning issues that led to this service being discontinued was when customer service agents requested medical records from an individual who missed Court. The representative instructed the constituent to bring those records to the Court for review in consideration for a new date. This interaction prompted immediate action as the Court would never ask a constituent for private medical records to justify a court date. Outside of this issue, the Court experienced issues with customer service agents having unfettered access to the eTIMS system. Clerk and Judge's notes were overridden in the system, Court dates were changed, and payments were accepted without communications to the Clerk's office. The customer service component of the contract was found to be a hinderance to the community and Court due to the repeated complaints from constituents and negative impacts on the Court listed above, the Court Administrator has removed the Customer Service component offered by Conduent.

2. **Recommendation** – Meet with the eTIMS vendor onsite to review user access and user software capabilities

#### Management Comments:

As of January 2024, Conduent has met onsite to address ongoing issues within the Court to no avail. The same issues have been reiterated now in person that were addressed for many months (and prior to my arrival) via email. These issues have ranged from constant log outs to the provided equipment not functioning during Court, processing payments, in the Clerk's office, and even judgments not saving when entered during Court. The Clerk's office consistently experiences issues that impact the Curbside Contract (parking, environmental) to Redlight and Speed. Curbside is the only component of the contract to be addressed on site and have active resolutions in the works. Redlight and Speed Camera account executives Reese Blahuta, Lauren Weintraut and now Ceasar Harris have not resolved many ongoing issues the Court experiences for the red light and speed contract. (\*Please note that Ceasar Harris is new to the contract as of 2/23/24 and has not engaged the Court to address any outstanding issues as of yet. He has only been introduced as a new point of contact.)

The updated user list has not been provided at this time, though requested repeatedly. This issue has not been raised with the Boston office only with Reese Blahuta during the initial audit. The Court and auditor were informed that this issue would be researched but no follow up from said research from Conduent has been given.



3. **Recommendation** – Meet with the eTIMS vendor onsite to review software functionality and capabilities

#### Management Comments:

The Court has repeatedly met with the eTIMS vendor's curbside team from Boston beginning what the Court hopes is an optimistic path to resolution of those issues. The Court has been informed the ongoing issues with curbside will be resolved with assistance from the Boston office who recently began managing this component. The team in charge of the ongoing Red Light and Speed camera issues have communicated no resolution as of now and the account has changed hands three times with only further issues arising. Reese Blahuta and Lauren Weintraut and now Ceasar Harris have not resolved many of the ongoing issues the Court experiences in their control. It seems to be a band aid approach is taken rather than actual resolution. (\*Please note that Ceasar Harris is new to the contract as of 2/23/24)

4. Recommendation – Request a SOC or independent security assessment be performed

#### Management Comments:

This has been requested through Reese Blahuta who did not provide a response. The Boston office handling the curbside account indicated one does exist and I have submitted a formal request for same from them as well.

5. **Recommendation** – Reach out to eTIMS to and meet with the vendor to validate\resolve performance and other issues

#### Management Comments:

We have reached out to Conduent regarding eTIMS and while they are working on the impact the curbside issues have, as stated above, redlight and speed issues are largely ignored. Performance issues we have indicated as problematic to the red light and speed team include but are not limited to:

- Speed Cameras issuing outside of designated times
  - "resolution" from Conduent: administrative voids and an email indicating the issue would be researched with no further follow up
- Green Light/Blinking Red Light issuance
  - "resolution" from Conduent: administrative voids, an email indicated the issue would be researched with no further follow up
- Nixie Addresses (bad addresses) continuing to be used to notice violators
  - Resolution from Boston Office (curbside): Ensuring program is working as intended, when a Nixie address is indicated the address is no longer used and a new address is researched
  - Resolution from Reese/Lauren/Ceasar: None
- Incorrect violations transmitting to the etims product
  - Resolution from Lauren Weintraut: Fixing the issue from 1/18/2024 forward, no fix for tickets with this error from 1/1/2023 to 1/17/2024
- No Access to Red Light Videos without Conduent physically coming to the Court to view
  - $\circ$  Resolution: None. Conduent Rep appears for (most) trials when noticed

- Photos prior to 2019 are not available and appear as "corrupt"
  - Resolution: An email indicating the issue would be researched with no further follow up
- Judgments not saving
  - Resolution: The Boston office is investigating this issue as it has previously gone unaddressed with the previous account executives referenced throughout this report.
- 6. Recommendation Develop and document formal policies, procedures, and protocols

#### Management Comments:

The Court is working through the current policies and procedures currently to gauge for better security, accuracy, and dual controlled protocols. The staff and judiciary agree that a court management software that will bring formality as well as procedural consistency at implementation. At this time the software allowing us to do so is a work in progress. The internal controls hinge upon accessibility that the Court does not currently have available due to Conduent's lack of transparency and in-house access.

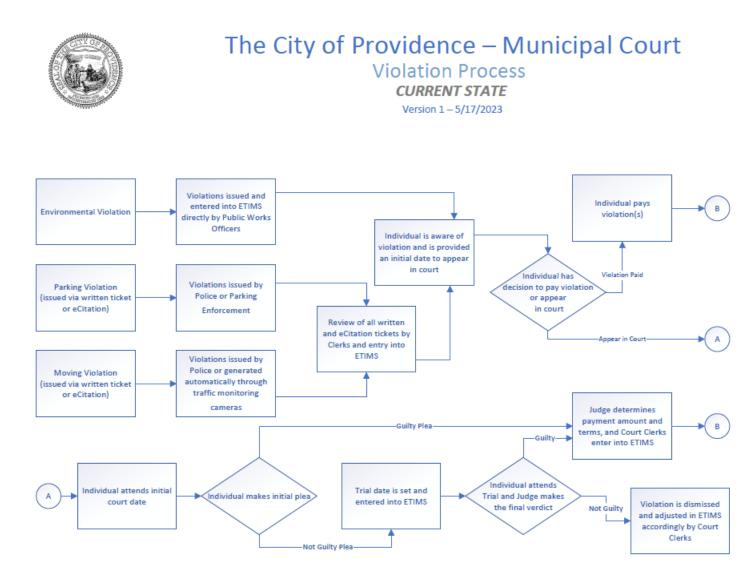
7. **Recommendation** – Increase frequency of transferring daily payment reports to the Controller's office

#### Management Comments:

This may have been an issue prior to the new Court Administrator's arrival, as of now Brinks arrives via armored vehicle and armed guard to pick up deposits and reports daily. Outside of this, reports can only be generated when Conduent sends them to us to be generated. We have no control over this function as the software does not allow for open financials or viewing by any member of our staff. Each report is posted by Conduent on the specified date and time they choose.



### A. Violation Process



### B. Payment and Deposit Process

