South Carolina Rental Car Quality Assurance Program Standards

Overview

The South Carolina Rental Car Quality Assurance, (RCQA) program allows service providers and rental car participants to apply for titles electronically and securely store inventory. The Electronic Registration & Titling, ERT program may be supplied through an Electronic Vehicle Registration (EVR) system for approved service providers and rental car participant, hereafter referred to as "service providers or rental car participant," that may develop their own interface program. Each rental car participant is designated access to one login, that is restricted to only services rendered by that rental car company. The service provider will work with the SCDMV to develop a computer-based system that will enable them to title electronically and provide a license plate and registration with decal to their customer. The SCDMV authorizes service providers or rental car participants to process the initial application for a vehicle title and registration. The SCDMV reserves the right to modify these standards to make the EVR process most efficient ultimately, as technology evolves, making this process 100% electronic. Through a link to the SCDMV, rental car participants may perform the following functions:

- a. Vehicle Inquiry
- b. Customer Inquiry
- c. Title/manufacturers certificate of origin (MCO) with New Registration
- d. Out-of-State (OOS) Title with New Registration
- e. SC Title Transfer with New Registration
- f. Void Transactions
- g. Plate/decal issuance
- h. Status

Participation in the RCQA Program

Service providers and rental car companies interested in providing services to rental car participants will complete the SCDMV Application for Electronic Registration & Titling (Form EVR-3), SCDMV Electronic Registration & Titling Service Provider Contract, Rental Car Quality Assurance Contract, and the Mutual Non-Disclosure Agreement. These documents may be emailed to EVRCoordinator@scdmv.net or mailed to:

ATTN: EVR Coordinator

SCDMV 10311 Wilson Blvd (certified only)

PO Box 1498 Blythewood SC 29016

The rental car participant may contact a service provider to begin the process of application to provide EVR services through the ERT program. The service provider may submit the application package on behalf of the participating entity.

A rental car participant may desire to internally develop the computer systems and technology to communicate directly with the SCDMV versus using a service provider. These entities must meet the same technical requirements as service providers and achieve technical certification. Rental car participants should indicate their desire to develop their own computer system in a letter of request to the SCDMV. This request may be mailed to:

ATTN: EVR Coordinator

SCDMV 10311 Wilson Blvd (certified only)

PO Box 1498 Blythewood SC 29016

Or emailed to EVRTCoordinator@scdmv.net.

Standards for Participation

Entities interested in participating in the RCQA program shall demonstrate understanding and commitment to the following:

- a. The following documents must be submitted; SCDMV Application for Electronic Registration & Titling (Form EVR-3), SCDMV Electronic Registration & Titling Service Provider Contract, Rental Car Quality Assurance Contract, and the Mutual Non-Disclosure Agreement.
- b. Rental car participants shall bear all costs for participation in the program, such as computer hardware, labor, electronic interface system charges, transaction processing, mailing, and ordering/shipping of required inventory, and supplies (when applicable).
- c. Rental car participant system users shall attend training as required by the SCDMV or the service provider. Rental car participants must ensure all employees (users) of the ERT program are trained by the SCDMV or service provider in the computer system and business processes on how to properly enter and transmit EVR transactions.
- d. Rental car participants shall comply with all rules, procedures, and standards applicable to RCQA and Electronic Registration & Titling, ERT programs.
- e. Rental car participants shall comply with DMV requirements for handling and filing of Personal Identifiable Information. PII documentation.
- f. Rental car participants must agree to forward to the SCDMV all required documentation such as office activity and other reports no later than five business days after completing the transaction.
- g. Rental car participants and/or service providers shall order and securely store inventory exclusively in South Carolina.
 - a. The securely stored inventory must be in a climate-controlled environment that is accessible by authorized personnel only.
- h. Rental car participants shall order inventory, such as plates and decals for rental car use only.
- i. Rental car participants shall maintain record of inventory status/location and ensure all inactive and/or damaged inventory are returned to SCDMV.
 - a. Plates (RP3, TR1)
 - b. Registration with decals (491-AVs)
 - c. Status
 - i. INI In inventory
 - ii. RIS Ready to issue
 - iii. ISS Issue
 - iv. MIS Missing
 - v. DMG Damaged
 - vi. WSU Wrong stock used

j. The RCQA unit will review reports and inventory to verify the rental car participants and/or service providers participation standards have been met. The RCQA Unit will perform an evaluation of rental car participants which includes, but is not limited to, reports and inventory to ensure compliance with program standards.

If the rental car participant and service provider meets all requirements for participation in the ERT & RCQA programs, the EVR Coordinator will activate the participant EVR status in the DMV computer system and send notification, in writing, of the entity's acceptance to the program.

Any rental car participant's and service provider's evaluation resulting in denial of ERT & RCQA participation will be communicated, in writing, to the specific entity. The denial letter will include the reason for denial and an explanation of the entity's opportunity for review within 15 days.

Training Certification Process

New rental car participants are required to obtain training from the SCDMV titling course and/or training from the selected service provider before starting EVR transactions.

- a. Service providers shall inform the EVR Coordinator and/or RCQA Manager of any training that will be offered to rental car participant system users prior to delivering the training and allow the DMV to participate, based on staff availability, to answer questions.
- b. The service provider will provide the EVR Coordinator and/or RCQA Manager with the names of the rental car participants, the location, and the date of the training within thirty (30) days of completion.
- c. Service providers will use the training material provided by the SCDMV. Any additional material referencing title processing practices must be approved by the EVR Coordinator at least ten business days prior to issuing training.

Performance Standards

To maintain eligibility in the ERT & RCQA Programs, a rental car participant system user must:

- a. Obtain and maintain SCDMV ERT Titling Processing certification.
- b. Process 100% of EVR eligible transactions for rental car use only through the EVR system within 60 days after first use of the ERT program (this is during the probation period).
- c. Ensure that the work processed conforms to the requirements of the ERT & RCQA programs.
- d. Submit all reports and inventory to the SCDMV no later than 5 business days of completing the transactions.
- e. Work with the RCQA team and service provider, when necessary, to correct and improve transaction processing of damaged and/or missing inventory, storing inventory within a climate-controlled environment in a secured facility/room exclusively in South Carolina, etc. If the following standards are not adhered to, it will result in the following:
 - 1. First notice: The Rental Car Quality Assurance Unit will call and email the rental car participant notifying them of critical errors.
 - 2. Second notice: The Rental Car Quality Assurance Manager will call and email the rental car participant and/or Service Provider notifying them of the rental car participant's critical errors.
 - 3. Third notice: The Vehicle Services Program Manager will submit a letter of possible termination to the rental car participant and/or Service Provider.

- 4. Fourth and final notice: The Vehicle Services Director or Deputy Director will submit a notice of termination to the rental car participant and/or Service Provider with an effective date of termination.
- f. Attend periodic training as requested by the RCQA Manager, EVR Coordinator, and service provider.
- g. Review SCDMV procedure updates and ensure system users are in compliance.

Termination-Service Provider/Rental Car Participant

If the SCDMV determines to its satisfaction that the service provider or rental car participant have either misused or knowingly allowed the misuse of SCDMV data and inventory, the SCDMV may, in addition to other penalties provided by law:

- a. Terminate the contract immediately, without regard to written notice,
- b. Require the return of all files, inventory, and media containing information provided by the Department,
- c. Hold the service provider and/or rental car participant responsible for any damages arising from the misuse of the information,
- d. Make publicly available the evidence of information misused; and
- e. Prosecute or seek remedies made available to the SCDMV or the State.

The SCDMV may suspend or terminate **all** access privileges of the service provider and/or rental car participant without a hearing upon the service provider's or rental car participant's breach of or failure to fulfill any responsibility established pursuant to the contract and program standards as they may be amended from time to time.

Security Requirements

The following requirements and business rules must be observed by system users within participating entities:

- a. To abide by all applicable state and federal privacy laws to ensure the integrity and confidentiality of DMV customer data and inventory.
- b. Rental car participants and service providers must store all SCDMV inventory within a climate-controlled environment in a secure location in the State of South Carolina.
- c. Rental car participants and service providers ensuring the inventory mailing processes are secure.
- d. Rental car participants and service providers must provide names of all personnel with access to the secure facility/room where SCDMV inventory is stored.
- e. Rental car participants must notify RCQA Manager and the Service Provider of the termination or hiring of employees with access to the secure facility/room within 24 hours.
- f. Rental car participants must report any missing inventory, or inventory known or suspected of being improper used in violation of program standards, immediately to the RCQA unit and Service Provider by phone and written correspondence. An incident report explaining the circumstances of the missing inventory should be emailed to the RCQA unit within 24 within hours.
- g. All inactive, voided, wrong stock used, and damaged inventory should be sent to the RCQA unit within five business days.
- h. Rental car participants must ensure the inventory is both physically received and taken to a secure facility/room by authorized personnel.

Records Review and Compliance

The RCQA unit will review 100% of the inventory, reports, and supporting documents submitted by the rental car participant and/or service provider to ensure compliance and address inventory and/or processing issues found during the review.

Security Enforcement Audits

The RCQA unit will conduct audits for compliance. The agents will audit service providers and/or rental car participants on the following areas:

- a. Security
- b. Inventory
- Records maintenance

Security Violations

The SCDMV will audit rental car participants and/or service providers to confirm all entities are in compliance with security and records maintenance requirements. There are security violations that will require immediate action by rental car participants and/or service providers. These violations will be observed by the RCQA unit and reported to the RCQA Manager. The RCQA unit will advise the rental car participant and/or service provider of the violation(s) found during the SCDMV audit and will request confirmation from the service provider or participating entity that the violation has been addressed. The RCQA Manager may request a follow up audit to assure 100% compliance of SCDMV Security Requirements have been met. The violations are, but not limited to:

- SCDMV inventory not securely stored in South Carolina.
- Employee access to secure facility/room not updated.
- Secure facility/room not secured with access by using a fob, cards, passwords, or security codes.
- Damaged/wrong stock used/voided registration with decals not properly defaced.
- Damaged/wrong stock used/voided/inactive plates are not returned to SCDMV.
- Missing inventory not reported immediately by phone and written correspondence followed by incident report.

Documents Management

The rental car participant is required to submit the documents associated with each rental car transaction in a specific order:

- a. Transaction activity
- b. Inventory assignment log (office/employee)
- c. Missing inventory report (Missing, wrong stock used, damaged)
 - 1. Incident report (Missing inventory)
 - 2. Damage/wrong stock used decals
 - 3. Inactive/voided plates
- d. Secure room access (when changes occur)

Financial Reconciliation

At the end of each business day, files must be reconciled, and the service provider must submit all completed and reconciled transaction fees as an ACH payment by the end of the following business day.

All service providers, EVR, and Rental Car participants must provide a daily reconciled transaction report to the SCDMV via a CSV file. The file must be transmitted via SFTP to the designated SCDMV site (actual location will be identified by the DMV IT department).

- a. A summary by SCDMV service provider number.
- b. The detailed report shall include the SCDMV service provider number and be sorted and totaled by SCDMV service provider number.

ACH Enrollment Form Request Addressed to:

SC Department of Motor Vehicles Revenue Accounting (EVR/ERT ACH Enrollment Form) P O Box 1029 Blythewood, SC 29016-0012

Please make note that the following descriptive text is required for each ACH payment transaction:

- a. EVR/ERT
- b. Vendor Name
- c. Transaction Date of Service (this date should match the date of the records on the CSV report)
- d. Financial Account Number (if applicable)

Example: EVR/ERT Vendor Name 01/21/13 XXXXX

Reconciliation Process

The EVR Service Provider is responsible for the payment of all transactions that are processed via the ERT SCDMV system.

The SCDMV created the online ERT Reconciliation Inquiry accessible through the SCDMV Member Services page that provides a Summary by Service Type or Participant and a detailed listing of all EVR transactions.

The Service Type Summary is the first step for comparing the Service Provider Daily and/or the Participant EVR Activity Report to the SCDMV Reports. The Service Provider Summary and/or the Participant Summary is used in conjunction with the Service Type Summary to reconcile and identify discrepancies.

If the Service Type Summary and/or Service Provider Summary and/or the Rental Car Participant Summary do not match the service provider report and/or the rental car participant reports, the SCDMV also provides detailed transaction information by service provider and/or rental car participant to aid in the reconciliation process.

Supporting documentation is required for any discrepancies identified by the service provider or the participant. The ERT Vendor Reconciliation Guide has additional details of this service.

System Transmission Fees

In exchange for access to SCDMV data, EVR service providers or the rental car participants shall agree to pay to SCDMV the amount of \$10.00 per each update to complete a transaction define as Update Phase 2 (UPD2). A transaction is defined as when a participating service provider or a rental car participant performs an Update Phase 1 (UPD1) and an UPD2 to fulfill the transaction transmission. The UPD1 performs all the edits necessary to ensure a successful update to the SCDMV system and takes place at the time of sale. UPD2 updates the SCDMV system with the title and/or registration information, as applicable, and completes the transaction allowing the rental car participant to register and affix a plate to its vehicle.

The \$2.50 transmission fee will be included as a separate service transaction record when the UPD2 is submitted for the following transactions and will be submitted along with the service fee:

- a. Manufacturer Certificate of Origin
- b. SC title transfer
- c. Out of State title transfer

Rental Car Participant Requirements for Changing Service Providers

Rental car participants wishing to change service providers are required to wait three months before initiating the change. Rental car participants wanting to change service providers must notify the ERT QA Coordinator, RCQA Manager, and their current service provider immediately. Once notification of change is received by the SCDMV, the RCQA Manager will:

- a. Acknowledge receipt of change notification in writing and include the requirements:
 - 1. The rental car participant will have 30 days to complete all pending work.
 - 2. The RCQA Manager will verify with the Revenue and Accounting unit that all transactions are reconciled and required payments have been submitted.
 - 3. The RCQA Manager will notify the service provider of the effective date for the change.
 - ♣ The service provider is required to disable the rental car participant's account on the date instructed by the RCQA Manager. This date will be 30 days from the date of the change notice acknowledgement to the rental car participant.
 - 4. At the end of the 30 days the rental car participant will be placed in "cancelled" status pending the completion of the approval process under the new service provider.
- b. Notify service provider of the change and effective date.
- c. Place the rental car participant in monitoring status.

Inventory allocated to service providers becomes their responsibility, each assigned a unique office ID for oversight of the comprehensive physical inventory across all locations. If a rental car participant decides to become their own service provider, they will be responsible for processing transactions for all locations exclusively. In the event a rental car participant decides to switch service providers, they are required to return the allocated inventory to their prior service provider. After this, they can request new inventory from their new service provider.

Technical Standards Overview

The SCDMV offers a set of transactions in support of electronic titling and registration of vehicles. SCDMV-approved service providers can interface with the SCDMV system transmitting requests for vehicle information, customer numbers, and names, and submit requests to title and register vehicles.

Through these transactions, via approved service providers, rental car participants will have the information required to apply for a title, license plate and registration.

The SCDMV offers a web service API that can be used by the rental car participant to process EVR transactions. This service allows for the processing of EVR transactions through transmission of XML documents.

Approved service providers and third parties interested in the RCQA program must complete testing of the XML ERT web service and SFTP transaction reconciliation in the SCDMV online test environment and report to the EVR Coordinator all failures, and system error messages before the SCDMV provides access to process EVR transactions in our production environment.

The XML ERT web service is an enterprise service offered by the SCDMV. Service providers and third parties interested in providing electronic title and registration services wanting to use this service must build their interfaces to conform to the SCDMV's web service. The SCDMV will provide the XML schema to assist service providers and interested third parties in designing the interface. The SCDMV will assist with technical troubleshooting and data mapping while the service provider and/or a third party builds and tests their interface. The SCDMV will not be responsible for code development for parties interested in the RCQA technical development of their system.

Transaction Details

The following sets of transactions are provided in support of electronic filing of title and registration transactions.

a. Vehicle Inquiry

The vehicle inquiry requires one of the following:

- Vehicle Identification Number (VIN)
- Existing SC license plate
- Existing SC title number

The transaction will return the most current vehicle information to include the existing plate, plate expiration date, registration expiration date, rental car participant name, odometer reading, and current vehicle registered weight.

b. <u>Customer Inquiry</u>

The customer inquiry will allow rental car participant to obtain information on a specific rental car participant. The customer inquiry transaction requires one of the following criteria: license plate number, SCDMV customer number, or Federal Employers Identification Number. The transaction returns the current rental car participant name, rental car participant physical address, and mailing address if one exists.

c. <u>Title and/or Registration Updates</u>

The title and/or registration transactions update the SCDMV system with the title and/or registration information to obtain a title, issue a plate, and print a registration card. All plates and registration cards issued will be printed by the rental car participant and placed with the rental car participant vehicle(s).

The current EVR transactions support the following types of title transactions:

- 1. Title from MCO
- 2. Transfer of an SC title
- 3. Issuing a SC title based upon the receipt of an OOS title.

In conjunction with the EVR title transactions, the following type of EVR registration transactions are supported:

• New registration – limited to regular plates (RP3) and truck plates (TR1)

The title and registration update message occurs in two phases. The reason for this design is to allow the rental car participant to initiate the titling and registration process.

- 1. The UPD1 transaction performs all the edits necessary to ensure a successful update to the SCDMV system and takes place at the time the rental car participant registers a vehicle.
- 2. The UPD2 transaction updates the SCDMV system with the title and registration information as applicable and completes the transaction allowing the rental car participant to pull from their assigned plate inventory and print a registration card. All titles generated in this finalization phase will be batched through the SCDMV title batch process and sent to the car rental participant name on file and physical address or a special mailing address, if one exists, and/or if there is no lien, or with a lien stored as electronic titles if the lienholder is an electronic lienholder.
- Fees owed are returned by the SCDMV system on both the UPD1 and UPD2. The UPD2 transaction must follow within 45 days of the UPD1 transaction. If any lien data changes between the UPD1 and UPD2 message, only the lien data from UPD2 message is recognized.

A limited amount of information can change from the UPD1 transaction to the UPD2 transaction. Information that can be updated is limited to information not printed on the registration card and information not used in the calculation of fee. The following information can be updated:

- 1. Odometer reading and odometer legend.
- 2. OOS title number and state designation.
- 3. Lien holder information.

d. Voids

At times it may be necessary to void a transaction submitted to the SCDMV. SCDMV business rules dictate the timeframe for voiding a transaction. The voided transaction must contain both the VIN and the transaction number to be voided in addition to the audit information such as service provider and/or rental car participant number. The following business rules apply:

- 1. The transaction being voided must have been successfully completed.
- 2. The service provider and/or rental car participant number must be the same for the voided transaction as it was on the original transaction.
- 3. The following types of transactions can be voided:
 - a. UPD1 (title and registration phase 1)
 - b. UPD2 (title and registration phase 2)
 - UPD2 transaction must be voided before the UPD1 transaction is voided.
 - ii. UPD2 transaction must be voided in the same business day that it was executed.

e. Plate and Registration Issuance

The SCDMV developed a process for service providers and rental car participants to order, securely store in South Carolina, and issue inventory associated with titling and registering vehicles for rental car use via the existing ERT program.

- 1. Only two plate classes will support the RCQA program regular plate (RP3) and truck plate (TR1)
- 2. EVR process requires a completed UPD1 and UPD2 before the license plate and registration can be issued
- 3. The cost of the plates (Link to SCDMV fees)
 - a. RP3 \$40 (Trucks by GVW)
 - b. TR1 Based on GVW
- 4. The assigned plate number will include alphabetical and numerical characters:
 - a. RP3 Three numerical characters and three alphabetic characters.
 Example, 123 ABC
 - b. TR1 One alphabet (P) and five numerical characters. Example, P12345
- 5. Sample Plates RP3 & TR1





- 6. The rental car participant will include a registration with decal formatted with headers, labels, and data values. The expiration decal will show the month/year and plate number.
- 7. Sample Registration



f. Status

A web service transaction has been created to check the status of a previous UPD1, UPD2, or VOID request. On occasions, a request will complete on the SCDMV's side, but a confirmation never gets sent back to the originator which results in a "Pending EVR." The status request will

return the same data elements as the original UPD1/UPD2 or VOID. The service provider or participant can accept the data return from the request or use the data to attempt a VOID.

The SCDMV's expectation is that a STATUS request be completed, and a VOID attempted before the SCDMV will manually VOID an Update.