



# **VIN Inspection Program Assessment**

## **Commissioned by the Washington State Patrol**



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## EXECUTIVE SUMMARY

The Washington State Patrol (WSP) engaged First Rule Group (FRG) to complete an assessment of the Vehicle Identification Number (VIN) Program, with respect to the program's placement within the WSP, recruitment and retention, workload, and potential program efficiencies.

The key findings of this assessment derive from continuing increased demand for inspections beyond available inspection resources, challenges in staff recruitment and retention, insufficient funding dedicated to the VIN Inspection Program, and inadequate facilities and equipment.

The WSP VIN Program was created in 1972.

Data records from the WSP Crime Investigation and Tracking of Evidence (CITE) database were available beginning in 2009.

Washington state law requires physical inspections of certain vehicle types before a title will be issued. These inspections are carried out by the WSP VIN Program staff. Physical vehicle inspections are defined by RCW 46.12.560<sup>1</sup> and associated RCWs and WACs.

In 2001 WSP experienced severe budget cuts, and the VIN Inspection program staff was reduced from **73 to 17.5** VIN Officers. The previous tiered structure of the program of VIN Officer 1, VIN Officer 2, and VIN Officer 3 (Supervisor) positions were eliminated, and all were reverted to VIN Officer 1 level. Research into the job classification revealed that the VIN Officer 1 job description has not changed since it was created in 1997. The level of staff has remained the same for 22 years while the number of inspections has increased 101.15%, from 17,174 in 2009 to 34,545 in 2019.

Three VIN Officers left the program in 2020, and two of the three vacancies remained unfilled until third quarter 2022; 1 vacancy remains unfilled today.

In 2020 all VIN inspection facilities were closed for 11 weeks due to the COVID pandemic. This effectively removed a quarter's worth of appointments from the schedule. Several of the outlying locations have remained closed due to staff reductions. All District 8 facilities are closed, which means that no VIN inspections are available west of I-5.

The loss of VIN Officers, shutdown of the VIN lanes due to COVID, facility closures due to reduced staffing, and increasing demand for VIN inspections has resulted in long waits for available appointments.

Starting in 2013 the number of inspections performed has increased substantially over total inspections recorded in 2009. In 2013 the increase in inspections over 2009 was 45.15%, rising to 101.15% in 2019, the last year that the VIN Program was fully staffed.

Salvaged/Rebuilt cars comprise 82% of all inspections in 2022.

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<sup>1</sup> RCW 46.12.560

The number of required inspections continues to rise while the number of VIN Officers available to conduct the inspections remains the same – demand has exceeded supply since 2014.

Despite the additional effort on the part of VIN Officers wait times for VIN inspections began to rise and complaints about the inability to schedule inspection appointments have increased. The VIN inspection appointment schedule was limited to display a rolling 5-week period, opening one week of new appointments and any openings created by cancellation for the previously booked weeks. If appointment seekers are not successful obtaining an appointment they must wait until the following week to make another attempt to schedule their inspection.

The remaining current 13.5 VIN Officers have refined processes to implement efficiencies and have performed more inspections per VIN Officer every year, even after the loss of three VIN Officers in 2020.

In 2009 16.5 VIN Officers conducted 1,041 inspections per officer. By 2020 each officer performed 2,109 inspections each.

In 2021 the remaining 13.5 officers performed 2,241 inspections each, and in 2022 that increased to 2,419 inspections each. Since 2009 those are respectively a 115.27% increase in inspections in 2021, and a 132.45% increase in 2022.

### Total Count and Percentage Increases in VIN Inspections - Per Year and By Officer

Year	Totals	# of VIN Officers	Totals Per Officer	Year over Year Increase in Totals	Year over Year Increase by Officer	Percentage Increase in Totals since 2009	Percentage Increase by Officer since 2009
2022*	32,663	13.5	2,419	7.98%	7.98%	90.19%	132.45%
2021**	30,249	13.5	2,241	6.22%	6.22%	76.13%	115.27%
2020**	28,478	13.5	2,109	-17.56%	0.76%	65.82%	102.67%
2019	34,545	16.5	2,094	7.17%	7.17%	101.15%	101.15%
2018	32,235	16.5	1,954	4.13%	4.13%	87.70%	87.70%
2017	30,956	16.5	1,876	13.32%	13.32%	80.25%	80.25%
2016	27,317	16.5	1,656	4.30%	4.30%	59.06%	59.06%
2015	26,191	16.5	1,587	5.56%	5.56%	52.50%	52.50%
2014	24,811	16.5	1,504	-0.47%	-0.47%	44.47%	44.47%
2013	24,928	16.5	1,511	25.85%	25.85%	45.15%	45.15%
2012	19,808	16.5	1,200	3.70%	3.70%	15.34%	15.34%
2011	19,102	16.5	1,158	-3.72%	-3.72%	11.23%	11.23%
2010	19,841	16.5	1,202	15.53%	15.53%	15.53%	15.53%
2009	17,174	16.5	1,041				



As stated, one vacancy from 2020 remains unfilled. Efforts to hire new VIN Officers have been hampered by the low pay level<sup>2</sup> and the lack of career advancement available in the VIN Program, based on feedback from job candidates.

Retention of current staff is another risk to the program. The increase in workload and unceasing increase in demand for inspections has exceeded the capacity of the VIN Program. One quote from a senior VIN Officer is that it is difficult to be asked to work even harder after the three vacancies in 2020 for such a low level of pay and no possibility for advancement.

No relief has been available to the VIN Program until 2022, when the legislature provided funding for five non-permanent positions, which expires at the end of June 2023. However, between June and mid-September 2022 there were five rounds of advertising which resulted in no new hires. Again, feedback from the candidates was that the low pay and the lack of career advancement were disincentives to accept the job.

The most critical immediate recommendation is to stabilize, increase, and retain the workforce.

The data supports the assertion there are not enough VIN Officers employed by WSP to complete the inspections required by RCW 46.12.560.

The remainder of this document outlines the observations made, supporting data analysis, and proposed recommendations for remediation where viable.

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<sup>2</sup> Current Pay Scale



## INTRODUCTION

Washington state law requires physical inspections of a variety of types of vehicles before a title will be issued. These inspections are carried out by the Washington State Patrol (WSP) Vehicle Inspection Program.

The WSP VIN Program was created in 1972 to validate clean title of ownership, verify that the vehicle and/or its major component parts are not stolen goods, and confirm that the repaired, replaced, or rebuilt major component parts are documented appropriately. These are accomplished through physical inspection of vehicles and review of required documentation. VIN performed physical inspections on every used vehicle submitted for a title, including vehicles from other states and other countries.

In July of 2001 budget cuts forced the WSP to radically reduce VIN staffing from 73 to 17.5 employees. In response to the staff reduction the requirement for a physical inspection requirement of all out-of-state and foreign vehicles seeking a Washington state title to just those with existing title issues.

In addition to reducing the number of staff, the tier levels for VIN Officers and dedicated VIN Supervisors were eliminated. Detective Sergeants from the Criminal Investigative Division were assigned on a rotating basis as supervisors for VIN Officers.

As a result, the VIN Inspection program staff was:

- 16 full time VIN Officers
- 1 part time VIN Officer
- 1 VIN Help Desk Officer

In 2020 three full time VIN Officers departed the program, leaving unfilled vacancies.

The WSP is organized into 8 Districts. WSP VIN inspection facilities are geographically distributed to be convenient for those who need an inspection. Several of the outlying locations have been closed due to staff reductions. All District 8 facilities are closed, which means that no VIN inspections are available west of I-5.

Site closures combined with increased demand for inspections has created competition for inspection appointments. People who cannot schedule an appointment at a facility nearby may search other locations across the state for an opening. VIN Officers report that some have driven from Chehalis or Olympia as far away as Spokane for their inspection.

Below is a chart of all WSP districts, counties, facilities, and open/closed status.



District	Counties	Location Number	Location Name	Open/Closed
D1	Pierce	1	Tacoma	Open
	Thurston	None	None	N/A
D2	King	1	Bellevue	Closed
		2	SeaTac	Open
D3	Asotin	1	Clarkston	Closed
	Benton	2	Kennewick	Open
	Columbia	None	None	N/A
	Franklin	None	None	N/A
	Garfield	None	None	N/A
	Walla Walla	3	Walla Walla	Closed
	Yakima	4	Yakima	Open
D4	Adams	None	None	N/A
	Ferry	None	None	N/A
	Lincoln	None	None	N/A
	Pend Oreille	None	None	N/A
	Spokane	1	Spokane	Open
	Stevens	2	Colville	Closed
	Whitman	None	None	N/A
D5	Clark	1	Vancouver	Open
	Cowlitz	2	Kelso	Closed
	Klickitat	None	None	N/A
	Lewis	3	Chehalis	Open
	Skamania	None	None	N/A
D6	Chelan	1	Wenatchee	Open
	Douglas	None	None	N/A
	Grant	2	Moses Lake	Closed
	Kittitas	3	Ellensburg	Closed
		4	Cle Elum	Open
Okanogan	5	Okanogan	Closed	
D7	Island	None	None	N/A



	San Juan	None	None	N/A
	Skagit	1	Burlington	Closed
	Snohomish	2	Marysville	Open
	Whatcom	3	Bellingham	Open
D8	Clallam	1	Port Angeles	Closed
	Grays Harbor	2	Hoquiam	Closed (Target Opening 3/1/23)
	Jefferson	None	None	N/A
	Kitsap	3	Bremerton	Open (1/3/23)
	Mason	4	Shelton	Closed
	Pacific	None	None	N/A
	Wahkiakum	None	None	N/A

## CURRENT STATE

Physical vehicle inspections by the WSP VIN Program are required by statute before DOL will issue a title for certain vehicles. The *Washington State Patrol Inspection Request* form issued by DOL is a physical paper form. DOL does not count nor track how many forms are distributed. These forms are not available online.

RCW 46.12.560 currently requires a physical inspection be performed by the WSP VIN Program of

- Salvaged vehicles
- Assembled vehicles
- Glider kits
- Homemade vehicles
- Kit vehicles
- Street rod vehicles
- Custom vehicles
- Vehicles where ownership is in doubt per RCW 46.12.680
- Vehicles with a VIN which has been
  - Altered
  - Defaced
  - Obliterated
  - Omitted
  - Removed
  - Or is otherwise absent

During the inspections the VIN Officers review the required paperwork, search the appropriate databases, examine photos of any previous damage to the vehicle if it exists, and search Vehicle Identification Numbers (VIN) throughout the vehicle to,<sup>3</sup>

1. Confirm ownership
2. Ensure that repair/replacement parts for major components of the vehicle are properly documented, and
3. Verify that no portion of the vehicle has been stolen.

The WSP will assign a new VIN (if required) and place the tag on the vehicle. Original properly documented invoices as defined in the RCW must be presented for any Major Component Parts which have been repaired or replaced.

The current fee of \$ 65.00 per RCW 46.17.135 must be paid to DOL when the vehicle owner presents the *WSP Statement of Fact* and *Certification of Vehicle Inspection* forms during the vehicle registration process.

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<sup>3</sup> VIN Inspection Process Document



VIN inspection staff levels have remained the same for 22 years, while the number of inspections has more than doubled, from 17,174 in 2009 to 34,545 in 2019. Total inspections are estimated to reach 32,663 in 2022. Since 2020 there have been three unfilled vacancies for VIN Officers.

The COVID 19 pandemic caused major disruptions for every business and all state agencies in 2020 and 2021. As a result, fewer total inspections were conducted due to:

- A shutdown of all VIN facilities from 3/14/2020 to 5/25/2020 (11 weeks)
- Reduced mobility of the population per mandated shutdowns
- Facilities were closed due to lack of personnel

The loss of VIN Officers, shutdown of the VIN lanes due to COVID, facility closures due to reduced staffing, and increasing demand for VIN inspections has resulted in long waits for available appointments.

Supply issues caused a shortage of new vehicles, which further promoted the business of selling rebuilt/repaired salvaged cars.

There is no accurate way to estimate the backlog of unfulfilled appointments. When the next block of appointments is released weekly, every available appointment is booked within minutes. VIN Officers may spend as much as an hour each week examining the bookings and cancelling duplicate appointments made by the public.

More than 400 phone and email complaints are received each month. One facility received more than 120 phone call complaints in one day. Most complaints are about the inability to schedule a VIN inspection. Others are requests for assistance to schedule the appointment.

There are 80 to 100 complaints sent directly to the WSP Program Manager each month. Detective Sergeants in the districts receive about a dozen each month. In 2021 the WSP Office of Professional Standards (OPS) received 59 complaints about wait times for VIN inspections. VIN Officers at each facility may spend up to 20 hours a week responding to complaints which further reduces the number of inspections performed.

Complaints are submitted from all levels, including the WSP OPS, the legislature and the Governor's Office, which have brought the program to attention. Some complainants state that they have tried for more than six months to secure an appointment.

Staff have worked overtime to meet the demands for inspections. VIN Officers work four 10-hour days Monday through Thursday or Tuesday through Friday. Some VIN Officers also elect to work additional 10-hour Fridays twice a month designated for dealer vehicle inspections. Between 80 and 100 inspections can be completed by two VIN Officers on a "Dealer Day", primarily because the dealers are familiar with the requirements and arrive with proper paperwork in hand. Other VIN lanes may dedicate one day of the week as a "Dealer Day". VIN Officers have implemented various efficiencies to save as much time per inspection as possible.





One efficiency is to no longer connect the computer analysis On-Board Diagnostic II (OBD II) Scanner to every vehicle being inspected. The OBD II is not required for every inspection type, but it indicates whether the airbag was deployed. The RCWs and WACs mandate what must be inspected and how. VIN Officers have no discretionary powers when enforcing the statutes during inspections. Most inspection appointments take 15-30 minutes.

The following inspection types are scheduled for 1 hour by the scheduling software:

1. VIN does not conform to 17 digits
2. No VIN – either for a Homemade vehicle or when the VIN is unidentifiable
3. DOL Code 6500 – special circumstances inspection
4. DOL Code 7700 – special circumstances inspection
5. Assembled, Street Rod, Custom, or Kit Vehicles
6. Other – the customer may not know the type of inspection they need

Training a VIN Officer for the entry level position is mostly on-the-job training with an experienced VIN Officer and takes 3 to 6 months. Training includes knowledge about the types of inspection to perform, the types and methods of fraud or misrepresentation to be aware of, how to work with the public, safety measures to practice, and how to research the vehicle in the many databases and sources available. These include:

1. NCIC – National Crime Information Center
2. WACIC – Washington Crime Information Center
3. DOL – Washington Department of Licensing
4. NIBC – National Insurance Benefit Coordinators
5. NMVTIS – National Motor Vehicle Title Information System
6. RISS – Regional Information Sharing Systems
7. IAAI – Insurance Auto Auctions
8. CoPart – Auto Auction House
9. CarFax (if available) – database of vehicle information
10. CITE – the WSP Records Management System

Additional training is specific to the many types of vehicles and where to locate the VINs, dependent on manufacturer, vehicle model, and factory of origin. During the annual In-Service meeting VIN Officers share new information on fraud trends and show examples, such as repair/replacement part invoices which have been altered. Notes on any fraud and irregularities found during an inspection are recorded in the CITE database, which can be searched for duplicate invoice numbers and other illegal practices.

DOL collects the VIN inspection fee of \$ 65. A recent bill committed the entire \$ 65 fee to the State Patrol Highway account. The responsibility for funding and providing VIN Program staff, facilities, systems, equipment, utilities, uniforms, landscaping, trash, services, and infrastructure to conduct the inspections falls on the WSP. There is no direct or dedicated funding for the VIN Inspection program.



In July 2022 the legislature provided funding for five one-year positions to help with the backlog for appointments. The results of five rounds of advertising was **no** new hires for the eight vacancies (five one-year and three permanent) as of 9/01/2022. Comments from candidates who rejected the offer included

- Low Pay level
- No career advancement
- Conditions of work (VIN locations with no “lane” conduct all inspections outside in the parking lot with no cover for sun, rain, etc.)
- Objection to the THC rules - no cannabis use for 1 prior year and none allowed while employed with WSP
- Objection to the State Vaccination Mandate

An email from then Lieutenant Jason Ashley, the VIN Program Manager in August 2018 (Appendix 3)<sup>4</sup>, documents the increased workload of VIN Officers, which began in 2014. Below is an excerpt from LT Ashley’s email:

“Data only tells a part of the story but what this data expresses is we have reached maximum capacity with our available staff and the increases we are experiencing in requests for inspections can only have a deleterious effect on wait times.”

“Since 2014 there has been an increase of 6161 inspections with no new officers and varying vacancies throughout that period. There is a formula based upon the average where a VIN Officer can successfully conduct 2100 inspections per year. That is a minimum of 3 additional inspectors needed to handle the work load [sic] increase since 2014.”

“The current monthly average is 2900 inspections statewide. If this trend continues we will see inspection totals at the end of the year in the neighborhood of 35k.”

In 2019 there were 34,545 total inspections, matching LT Ashley’s prediction of nearing 35,000 per year. 2019 was the last year that the VIN Inspections program was fully staffed.

## VIN BEST PRACTICES

There are no national VIN inspection best practices or standards. Each state that performs VIN inspections defines the requirements by law, and these requirements differ from state to state. The most common element across the states which conduct VIN inspections is salvaged vehicles. Yet not every state with a VIN Program requires a physical inspection of salvaged vehicles prior to titling.

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<sup>4</sup> Email Authored by Lieutenant Jason Ashley

## VIN INSPECTIONS IN OTHER STATES

### How does the WSP VIN Program compare to any other state VIN Programs?

Every state which conducts VIN inspections creates its own statutes and rules. We were unable to find another state which is structured exactly like Washington, which uses a dedicated group of non-commissioned state patrol civilians to perform all VIN inspection activities for the entire state. Some states utilize a core of commissioned and armed law enforcement officers for the most involved VIN investigations in addition to non-commissioned officers like WSP VIN Officers. All other states which perform VIN inspections, however, include some variety of additional resources to perform VIN inspections. The additional resources may be from the Department of Motor Vehicles (DMV) or DOL, or private vendors with auto shops. There was a great range in the number of VIN resources, from as few as five and as many as thousands. There is no consistency because, again, every state defines their own statutes and rules. The survey responses indicate that WSP's VIN Program performs more types of inspections than most other programs, with one of the smallest number of officers in the country.

Similarly, there is variation in which vehicles are subject to inspection. Most states inspect salvaged vehicles.

Questions soliciting salary information did not appear on most of the surveys. The most common question was what fees are charged. The responses reflected a large range.

Data from 4 different surveys is included in separate Appendices:

- Members of the Association of State Criminal Investigative Agencies (ASCIA) – 13 responses

- Members of American Association of Motor Vehicle Administrators (AAMVA) 2023 – submitted to 54 contact names from responders to the previous AAMVA surveys – 7 responses

- Members of AAMVA 2020– 34 responses

- Members of AAMVA 2021 - depending on the question 29-35 responses

The WSP is a member of ASCIA. VIN submitted a request to ASCIA members asking questions about their VIN Programs for comparison purposes. The list of questions is found in Appendix 5.<sup>5</sup>

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<sup>5</sup> ASCIA Information

Responses were received from the Illinois State Police, Delaware State Police, Iowa State Police and DOT Inspectors, Missouri State Highway Patrol, Montana State Motor Vehicle Department, New Hampshire State Police, Louisiana State Police, Colorado State Patrol, Nevada State Police, Maryland Department of State Police, Pennsylvania State Police, and California Highway Patrol.

There is variety in the responses of every question asked. Some of these programs are not formal programs, some share VIN inspections with their DOT, others share VIN inspections with both DOT, other agencies, and often with sworn agents or sub-agents to perform VIN inspections. This is the case with all of the surveys.

The VIN Program is also a member of AAMVA, which provides an online method to create and distribute your own survey to the membership. The questions for both the 2020 and 2021 surveys are in Appendix 6<sup>6</sup> and 7<sup>7</sup> respectively.

An email was submitted to 54 contact names of responders to the 2020 and 2021 AAMVA surveys. This is Appendix 8<sup>8</sup>. There were 7 respondents to the questions below:

1. If you have a dedicated workforce doing only VIN inspections, how many employees and what is the pay for those positions?
  1. If your program does similar inspection types, what is the standard amount of time these inspections take?
  2. Approximately how many VIN inspections do you conduct a year?
  3. Does our VIN Program do more, less or equal to the types of inspections performed by your program?

There were 4 responses with salary information:

State	Salary per Month
Connecticut	\$ 4,948 - \$ 6,382.75
Idaho	\$ 3,466.67 - \$ 5,026.67
Mississippi	\$ 4,333.34
New York	\$ 5,105.84 - upstate \$ 5,358

Salaries differ geographically due to the local cost-of living. The COL is one of the elements of the Regional Price Parities – the RPPs from the Bureau of Economic Analysis – BEA.

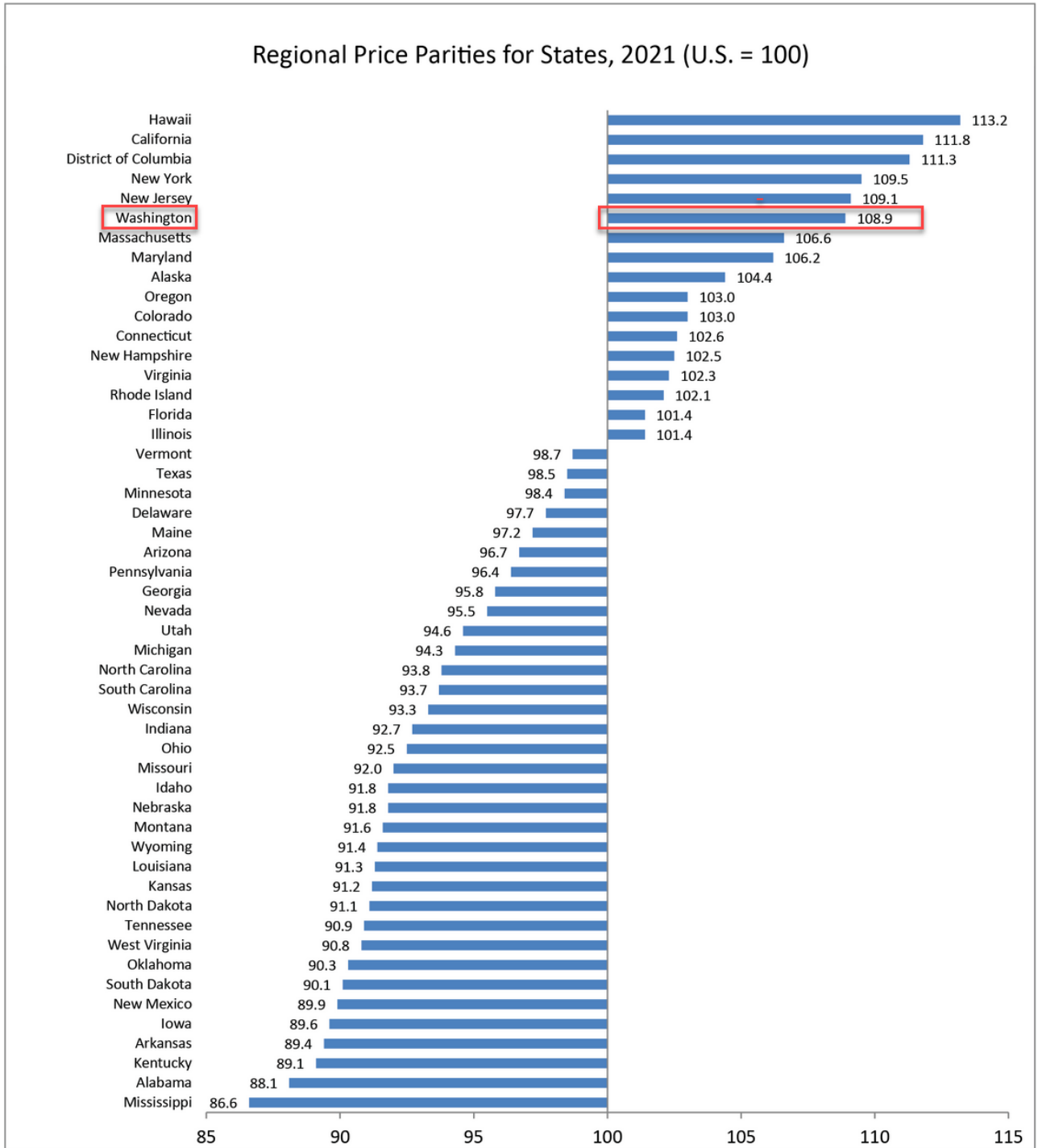
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<sup>6</sup> 2020 AAMVA Survey

<sup>7</sup> 2021 AAMVA Survey

<sup>8</sup> Additional Information Request

Below is a chart showing the RPPs nationwide. Washington state's COL was ranked 6<sup>th</sup> highest in the nation in 2021, with an index of 108.9, where the US is 100.



U.S. Bureau of Economic Analysis



The BEA provides a tool that will convert a salary in one region into the equivalent salary in another region. Again, the conversion formulas are from 2018.

For example, Idaho reported their starting monthly salary is \$ 3,467. The equivalent Washington monthly salary would be \$ 3,966. The current starting salary for a VIN Officer in Washington is \$ 4,216.

Per the conversion chart below Washington’s starting salary is lower than Mississippi’s without any conversion.

State	COL Index	Starting Salary per Month	Washington Salary Adjusted by COL
Washington	108.9	\$ 4,216	\$ 4,216
Connecticut	102.6	\$ 4,948	\$ 4,875
Idaho	91.8	\$ 3,467	\$ 3,966
Mississippi	86.6	\$ 4,333	\$ 5,380
New York	109.5	\$ 5,106	\$ 4,691

## METHODOLOGY

Data and information for this study was gathered through

1. Interviews with VIN Officers
2. Interviews with VIN Management and staff
3. Interviews with WSP Command Staff
4. Conversations with the Detective Sergeants who supervise VIN Officers
5. Solicitation of information during the annual In Service gathering
6. Solicitation of information from a survey to members of ASCIA
7. Solicitation of information from previous surveys to members of AAMVA
8. Solicitation to 54 participants in previous surveys by AAMVA
9. Observations of inspections at four different VIN facilities – SeaTac, Chehalis, Vancouver, and Tacoma
10. Internet searches
11. Queries of data from the WSP CITE records management system for all records where Status = *Complete* or *In Process*. *In Process* status means that the physical inspection was completed but the *Statement of Fact* and *Certification of Inspection* were not issued due to lack of required documentation. *In Process* is changed to *Complete* when the required documentation is presented.
12. Queries and downloaded data from DOL for report (13) *Motor Vehicle Registration By Class and County - Calendar YYYY* for each Calendar Years 2016 through 2022 YTD
13. Two Public Records Requests from DOL:

**Request 22-19216** for the same data as existing report (13) *Motor Vehicle Registration By Class and County - Calendar YYYY* counting ONLY registrations which required a VIN inspection (data selected where the VIN inspection fee was paid), requesting this data for Calendar Years 2000 through 2022. Historical data was only available for 2016-2022.

**Request 22-19218** for the same data as existing report (13) *Motor Vehicle Registration By Class and County - Calendar YYYY* requesting this data for Calendar Years 2000 through 2015. Historical data was only available for 2009 through 2015.

## FINDINGS

Data from both the VIN Program and DOL has been analyzed to answer the following questions:

1. How many inspections are being performed each year?
2. How many inspections are being performed per VIN Officer each year?
3. How many VIN Officers are needed to conduct inspections at the current rate of demand?
4. What percentage of inspections are performed for dealerships and what percentage are for private individuals?
5. What percentage of inspections are performed for salvaged/rebuilt vehicles and what percentage are for all other types of inspections?
6. How many VIN inspection fees has DOL collected?
7. How does the amount of collected VIN fees compare with the number of inspections completed by VIN?

Analysis of the count of VIN inspections per WSP District completed annually since 2009 (see chart below) shows a steady increase in the number of inspections performed in Washington state.

In 2009 17,174 inspections were performed. By 2019 that number more than doubled to 34,545. The estimated total for 2022 (based on Q1-Q3) is 32,663 inspections will be completed.

### Number of VIN Inspections per District per Year

YEAR	DISTRICT								TOTAL COUNT
	1	2	3	4	5	6	7	8	
2022*	2,590	5,521	7,099	3,522	2,523	938	2,302	2	32,663
2021**	5,110	5,378	5,841	4,284	3,616	1,993	4,023	4	30,249
2020	5,260	5,351	4,773	3,447	3,320	1,996	4,015	316	28,478
2019	7,657	6,101	6,028	3,834	3,637	988	5,033	1,267	34,545
2018	6,989	5,871	5,192	3,617	3,438	1,056	4,754	1,318	32,235
2017	6,496	6,685	3,717	3,739	3,177	1,122	4,771	1,249	30,956
2016	4,614	5,576	3,351	3,517	3,065	1,165	4,841	1,188	27,317
2015	5,285	4,481	3,497	3,101	3,097	1,309	4,164	1,257	26,191
2014	5,421	4,021	3,747	3,305	2,609	1,360	2,990	1,358	24,811
2013	3,986	5,203	4,186	2,738	2,784	1,065	3,604	1,362	24,928
2012	2,687	4,300	4,280	2,169	1,728	704	2,891	1,049	19,808
2011	3,079	2,822	4,314	2,338	2,039	680	2,455	1,375	19,102
2010	3,228	2,321	4,899	2,519	1,751	787	2,636	1,700	19,841
2009	3,056	1,588	4,418	2,210	1,746	796	2,324	1,036	17,174
<b>TOTALS**</b>	65,458	65,219	65,342	44,340	38,530	15,959	50,803	14,481	368,298

Data shows that demand for VIN inspections increased sharply, rising from 19,808 in 2012 to 34,545 inspections in 2019 (see chart below).

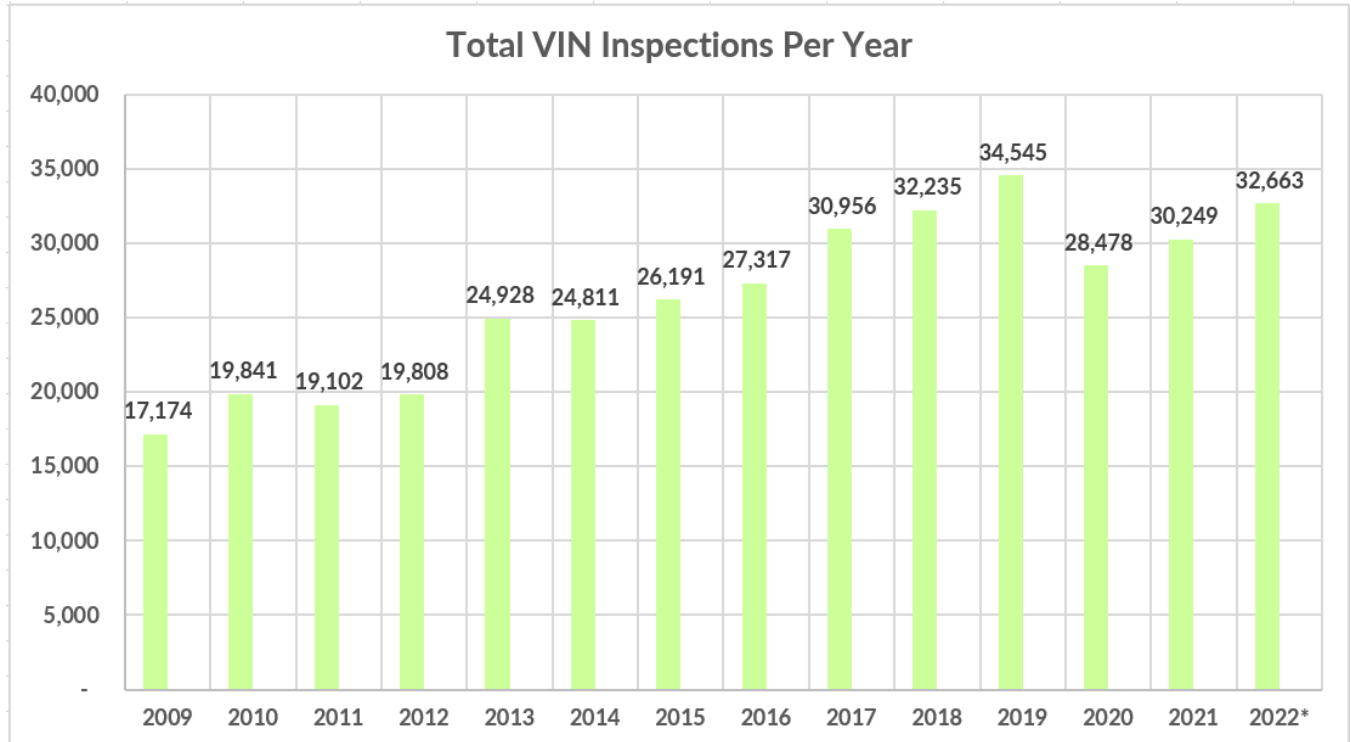
Since the decline of inspections in 2020 (due to 11 weeks of closure for the pandemic), the number of completed inspections has begun to grow again, from 28,478 to 30,249 inspections in 2021, and an estimated total of 32,663 in 2022.

\*2022 is estimated using the counts for prior quarters in 2022

\*\*Due to the pandemic state VIN facilities were closed from 3/14/2020 to 5/25/2020

\*\*\*All counts for Adams County are reported in District 4

Data collected from the CITE system of record for all VIN inspections with **Status** of **Complete** or **In Process**. **In Process** status indicates that the physical inspection was completed but required documentation was missing, without which the WSP Statement of Fact will not be issued.



The total number of inspections conducted per VIN Officer per year (see chart below) has risen more than 100% between 2009 and 2019, and has continued to rise at even higher rates since. The number of inspections completed in 2009 per VIN Officer was 1,041. In 2022 that number is estimated to reach 2,419, an increase of more than 133% over 2009. (Lieutenant Ashley’s email referred to the formula of 2,100 inspections per VIN Officer per year.)

Despite the three vacancies in 2020 the remaining 13.5 VIN Officers completed more inspections per officer – 2,109 – than 2,094 per officer in 2019, and they have continued to complete more inspections each year since. Total inspections in 2021 and 2022 (estimated) have risen at a rate similar to the pre-pandemic rate. The speed with which inspection appointments are scheduled has not diminished, which suggests that demand remains higher than supply. This would indicate that VIN Officers have made significant increased effort to meet a rising demand for inspections, and despite their increased efforts, completed total inspections overall are lower since 2020, when three VIN Officers left the program.

\*Estimated total

### Total Count and Percentage Increases in VIN Inspections - Per Year and By Officer

Year	Totals	# of VIN Officers	Totals Per Officer	Year over Year Increase in Totals	Year over Year Increase by Officer	Percentage Increase in Totals since 2009	Percentage Increase by Officer since 2009
2022*	32,663	13.5	2,419	7.98%	7.98%	90.19%	132.45%
2021**	30,249	13.5	2,241	6.22%	6.22%	76.13%	115.27%
2020**	28,478	13.5	2,109	-17.56%	0.76%	65.82%	102.67%
2019	34,545	16.5	2,094	7.17%	7.17%	101.15%	101.15%
2018	32,235	16.5	1,954	4.13%	4.13%	87.70%	87.70%
2017	30,956	16.5	1,876	13.32%	13.32%	80.25%	80.25%
2016	27,317	16.5	1,656	4.30%	4.30%	59.06%	59.06%
2015	26,191	16.5	1,587	5.56%	5.56%	52.50%	52.50%
2014	24,811	16.5	1,504	-0.47%	-0.47%	44.47%	44.47%
2013	24,928	16.5	1,511	25.85%	25.85%	45.15%	45.15%
2012	19,808	16.5	1,200	3.70%	3.70%	15.34%	15.34%
2011	19,102	16.5	1,158	-3.72%	-3.72%	11.23%	11.23%
2010	19,841	16.5	1,202	15.53%	15.53%	15.53%	15.53%
2009	17,174	16.5	1,041				

The chart below projects the number of staff positions had staff increased at the same percentage rate as inspections.

Prior to 2022 there were 16.5 full time VIN Officer positions. In July 2022 the legislature funded five non-permanent full time VIN Officer positions through June 2023. Full staffing for 2022 was 21.5 full time VIN Officer positions.

If the number of VIN positions increased at the same percentage rate as the number of inspections the projected total would be 33.5 VIN Officer positions for 2019 and 41 VIN Officers for 2022 (based on the estimated total for 2022).

\*2022 is estimated using the counts for prior quarters in 2022

\*\*Due to the pandemic state VIN facilities were closed from 3/14/2020 to 5/25/2020

\*\*\*All counts for Adams County are reported in District 4

### Projected Level of Staff at Same Percentage Increase as Inspections

Year	Totals	# of VIN Officer Positions*	Percentage Increase in Totals since 2009	Projected Increase in Staff
2022*	32,663	21.5	90.19%	41
2021**	30,249	16.5	76.13%	29
2020**	28,478	16.5	65.82%	27
2019	34,545	16.5	101.15%	33
2018	32,235	16.5	87.70%	31
2017	30,956	16.5	80.25%	30
2016	27,317	16.5	59.06%	26
2015	26,191	16.5	52.50%	25
2014	24,811	16.5	44.47%	24
2013	24,928	16.5	45.15%	24
2012	19,808	16.5	15.34%	19
2011	19,102	16.5	11.23%	18
2010	19,841	16.5	15.53%	19
2009	17,174	16.5		

The dip in the growth trend of completed inspections in 2020 interrupted what appears to be a constant rise in demand. It is prudent to estimate the number of inspections and staff needed had there been no closures for the pandemic. Let's examine two "What If" scenarios.

Scenario 1 – Projected Number of Staff if inspections increased at the average percentage rate each year

What would be the projected number of staff if an average percentage increase were applied every year? The percentage increase in total inspections between 2009 and 2022 is 90.10%. This is an average growth rate of 6.938% per year over thirteen years. The chart below shows projected staff levels if there were no pandemic and growth increased 6.938% each year. The projected number of VIN Officers would be 39 in 2022.

\*Estimated Total Inspections for 2022 calculated based on previous quarters in 2022. Based on Positions, not filled Positions.

\*\*All state VIN facilities were shut down from 3/14/2020 to 5/25/2020 due to the Pandemic.

\*\*\*All counts for Adams County are reported in District 4.

### Projected Level of Staff at 6.938% Increase Each Year

Year	Totals	# of VIN Officer Positions*	Percentage Increase in Totals since 2009	Projected Increase in Staff
2022*	32,663	21.5	6.938%	39
2021**	30,249	16.5	6.938%	37
2020**	28,478	16.5	6.938%	35
2019	34,545	16.5	6.938%	32
2018	32,235	16.5	6.938%	30
2017	30,956	16.5	6.938%	28
2016	27,317	16.5	6.938%	26
2015	26,191	16.5	6.938%	25
2014	24,811	16.5	6.938%	23
2013	24,928	16.5	6.938%	22
2012	19,808	16.5	6.938%	20
2011	19,102	16.5	6.938%	19
2010	19,841	16.5	6.938%	18
2009	17,174	16.5		

#### Scenario 2 – Projected staff if there were no pandemic in 2020

In 2020 VIN was closed for eleven weeks (from 3/14/20 to 5/25/20). That year 28,478 inspections were completed at a rate of 689.71 inspections per week for forty-one weeks. Calculating 689.72 inspections for fifty-two weeks equals 35,175 total inspections that year, higher than the peak total in 2019. The 34,545 inspections in 2019 were completed at a rate of 664.33 per week. This confirms that inspections during 2020 were being performed at a higher rate than in 2019, which proves that the trend of demand for inspections was increasing during the pandemic year.

The estimated total number of inspections for 2020 shows a 104.82% increase over the inspections in 2009, and a projected staff level of 34 VIN Officer positions. The projected number of staff for 2022 is 41. See the chart below.

\*Estimated Total Inspections for 2022 calculated based on previous quarters in 2022. Based on Positions, not filled Positions.

\*\*All state VIN facilities were shut down from 3/14/2020 to 5/25/2020 due to the Pandemic.

\*\*\*All counts for Adams County are reported in District 4.

**Projected Staff Level if no Shutdown in 2020**

Year	Totals	# of VIN Officer Positions*	Percentage Increase in Totals since 2009	Projected Increase in Staff
2022*	32,663	21.5	90.19%	41
2021	30,249	16.5	76.13%	29
2020*	35,175	16.5	104.82%	34
2019	34,545	16.5	101.15%	33
2018	32,235	16.5	87.70%	31
2017	30,956	16.5	80.25%	30
2016	27,317	16.5	59.06%	26
2015	26,191	16.5	52.50%	25
2014	24,811	16.5	44.47%	24
2013	24,928	16.5	45.15%	24
2012	19,808	16.5	15.34%	19
2011	19,102	16.5	11.23%	18
2010	19,841	16.5	15.53%	19
2009	17,174	16.5		

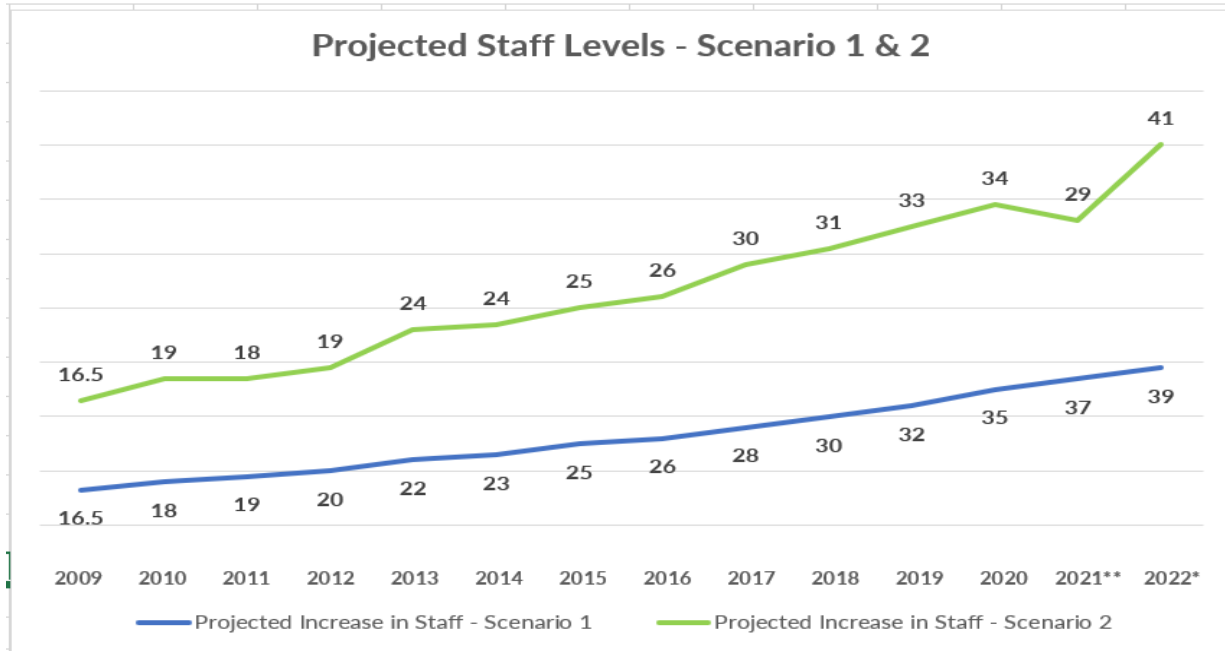
Below is the chart illustrating the growth trend for both Scenario 1 and Scenario 2.

The first line is Scenario 1 - the projected number of VIN Officer positions if the staff increased at the average rate of growth for every year between 2009 and 2022.

The second line is Scenario 2 - the projected number of VIN Officer positions if there were no shutdown in 2020 and the increase in staff is calculated with a full year of inspections. The projected staff in 2022 is 41.

\*Estimates for 2020 Inspections, 2022 Inspections for VIN Officer Positions





Based on analysis of the data for demand of inspections it is projected that VIN should now have 40 full time VIN Officers conducting inspections.

Per the CITE database Salvage/Rebuild vehicles comprised 87% of total inspections in 2020 and 82% of total inspections in 2022 through the third quarter. The number of salvaged vehicles being rebuilt and sold in Washington state has been increasing since 2018. The increase in market share for salvaged/rebuilt vehicles may be due to the substantial increase in the price of used cars. The average price of a used car in Washington state in 2022 was \$35,562, a 22.3% increase over the year before according to iSeeCars.com's [latest analysis](#) of over 1.8 million used car sales. Washington ranked 9<sup>th</sup> highest in the nation in used car price.

Interest rates for new cars were consistently lower than 4.5% between January 2014 and January 2018, which likely accounts for the reduction of Salvaged/Rebuild vehicles inspected from 2013 to 2018<sup>1</sup>.

<sup>1</sup> - <https://www.statista.com/statistics/290673/auto-loan-rates-usa/>

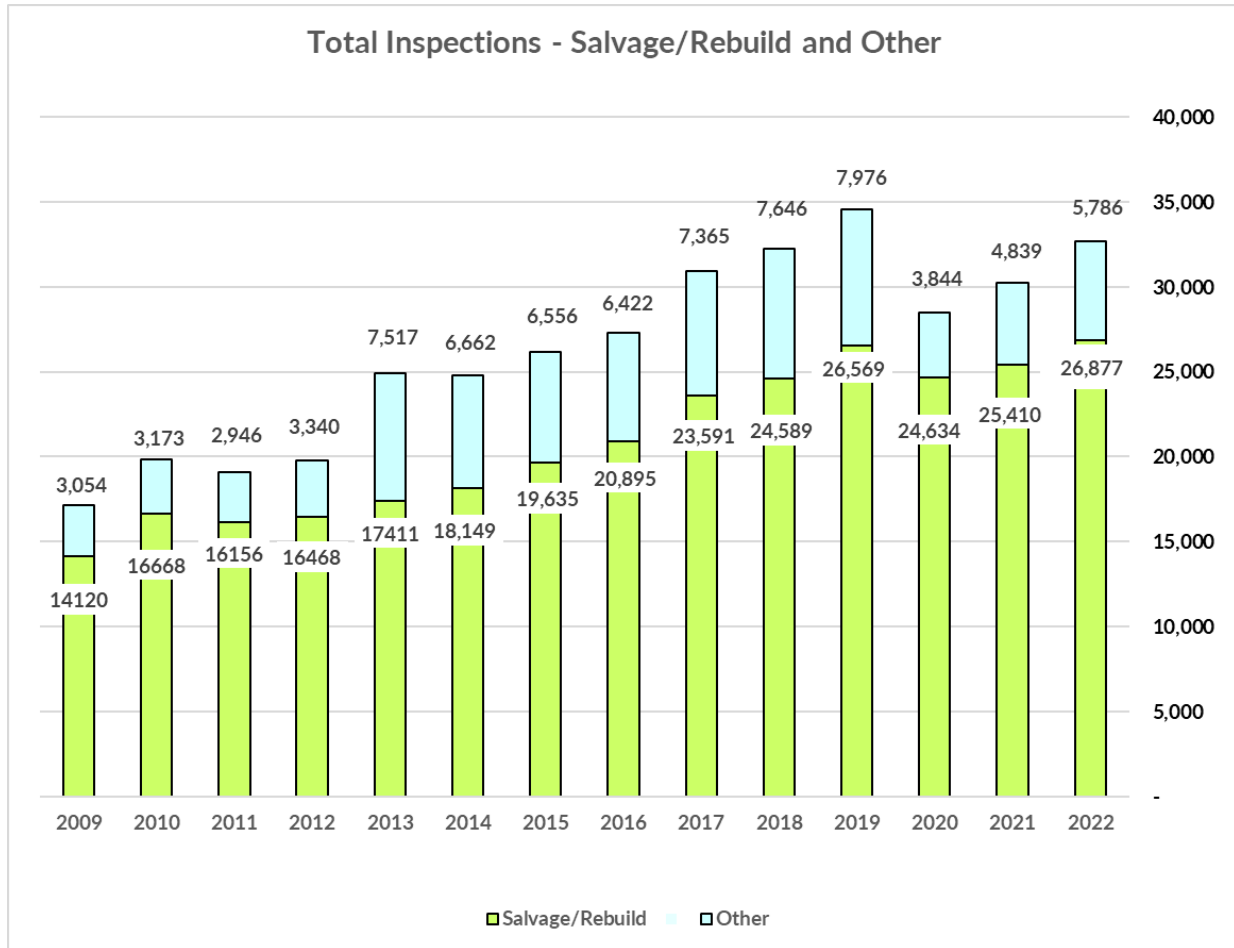
### Total Inspections - Salvaged/Rebuild versus Other Types

Year	Salvage/Rebuild		Other		TOTAL INSPECTIONS
	Count	Percentage	Count	Percentage	
2022	26,877	82%	5,786	18%	32,663
2021	25,410	84%	4,839	16%	30,249
2020	24,634	87%	3,844	13%	28,478
2019	26,569	77%	7,976	23%	34,545
2018	24,589	76%	7,646	24%	32,235
2017	23,591	76%	7,365	24%	30,956
2016	20,895	76%	6,422	24%	27,317
2015	19,635	75%	6,556	25%	26,191
2014	18,149	73%	6,662	27%	24,811
2013	17,411	70%	7,517	30%	24,928
2012	16,468	83%	3,340	17%	19,808
2011	16,156	85%	2,946	15%	19,102
2010	16,668	84%	3,173	16%	19,841
2009	14,120	82%	3,054	18%	17,174
<b>TOTALS***</b>	291,172	79%	7,126	21%	368,298

\*2022 is YTD through 3rd Quarter

\*\*Due to the Pandemic all VIN facilities were closed from 3/14/20 to 5/25/20

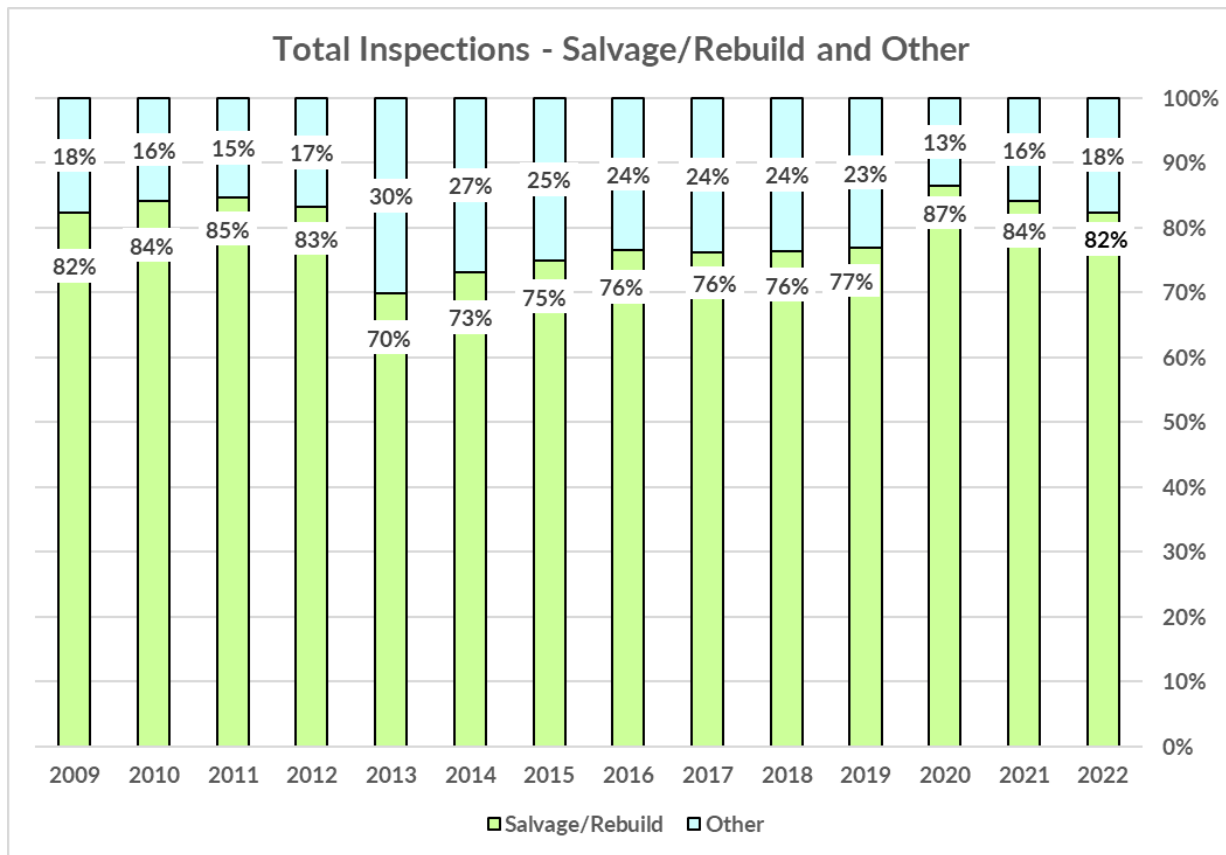
\*\*\*All counts for Adams County are reported in District 4



\*2022 is YTD through 3rd Quarter

\*\*Due to the Pandemic all VIN facilities were closed from 3/14/20 to 5/25/20

\*\*\*All counts for Adams County are reported in District 4



Per CITE data the percentage of dealer inspections has grown from 40% in 2020, to 42% in 2021, and to 43% as of 2022 YTD. The charts below illustrate the counts, percentages, and the trends for dealership versus private inspections.

\*2022 is YTD through 3rd Quarter

\*\*Due to the Pandemic all VIN facilities were closed from 3/14/20 to 5/25/20

\*\*\*All counts for Adams County are reported in District 4

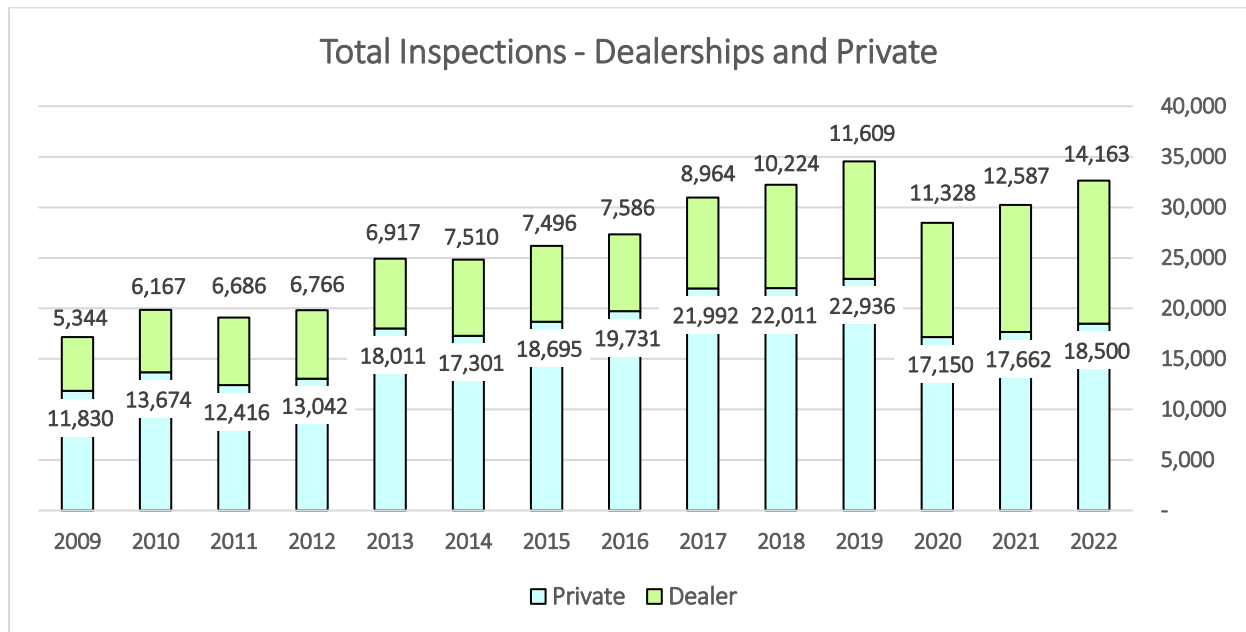
### Total Inspections - Dealer versus Private

Year	Dealer		Private		TOTAL INSPECTIONS
	Count	Percentage	Count	Percentage	
2022	14,163	43%	18,500	57%	32,663
2021	12,587	42%	17,662	58%	30,249
2020	11,328	40%	17,150	60%	28,478
2019	11,609	34%	22,936	66%	34,545
2018	10,224	32%	22,011	68%	32,235
2017	8,964	29%	21,992	71%	30,956
2016	7,586	28%	19,731	72%	27,317
2015	7,496	29%	18,695	71%	26,191
2014	7,510	30%	17,301	70%	24,811
2013	6,917	28%	18,011	72%	24,928
2012	6,766	34%	13,042	66%	19,808
2011	6,686	35%	12,416	65%	19,102
2010	6,167	31%	13,674	69%	19,841
2009	5,344	31%	11,830	69%	17,174
<b>TOTALS***</b>	123,347	33%	244,951	67%	368,298

\*2022 is YTD through 3rd Quarter

\*\*Due to the Pandemic all VIN facilities were closed from 3/14/20 to 5/25/20

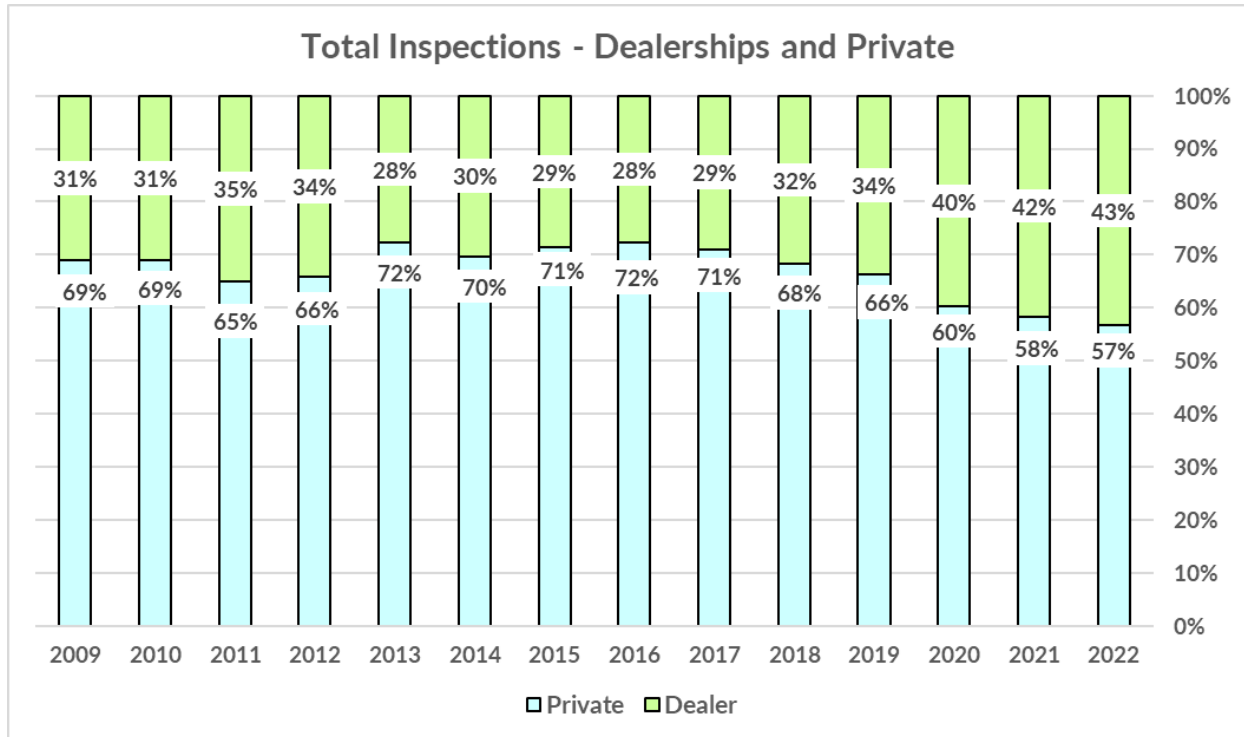
\*\*\*All counts for Adams County are reported in District 4



\*2022 is YTD through 3rd Quarter

\*\*Due to the Pandemic all VIN facilities were closed from 3/14/20 to 5/25/20

\*\*\*All counts for Adams County are reported in District 4



DOL provided the data for the number of VIN inspection fees for 2016 through 2022 YTD. The chart below displays the count of VIN inspection fees by District per Year from 2016 through third quarter 2022.

\*2022 is YTD through 3rd Quarter  
 \*\*Due to the Pandemic all VIN facilities were closed from 3/14/20 to 5/25/20  
 \*\*\*All counts for Adams County are reported in District 4



### DOL Count of VIN Inspection Fees Collected per District per Year

YEAR	DISTRICT								TOTAL COUNT
	1	2	3	4	5	6	7	8	
2022*	1,786	2,166	2,700	1,649	862	570	1,572	331	11,636
2021	1,964	2,474	2,745	2,062	1,180	681	2,315	378	13,799
2020**	2,205	2,838	2,451	1,770	1,516	682	2,524	389	14,375
2019	2,688	3,962	2,623	2,384	2,206	835	3,328	929	18,955
2018	2,666	3,857	2,304	2,329	2,087	837	3,180	790	18,050
2017	2,910	4,206	2,274	2,279	1,946	692	3,507	914	18,728
2016	2,138	3,718	1,723	1,673	1,200	558	2,840	562	14,412
TOTALS***	16,357	23,221	16,820	14,146	10,997	4,855	19,266	4,293	109,955

The count of VIN inspection fees collected by DOL between 2016 and 2022 YTD is just under half the number of inspections performed by VIN per CITE data. This discrepancy is much larger than expected. DOL confirmed that the inspection fee in the data represents fees paid by both private individuals and dealerships. There was no explanation for why DOL total counts were significantly lower than counts of VIN inspections. There is no reconciliation process between DOL and VIN for payment for number of inspections performed.

The chart below shows the difference between the number of inspection fees collected by DOL and the number of inspections performed by VIN. DOL has collected a total of 109,995 VIN Inspection fees between 2016 and 2022. The VIN CITE data showed a total of 216,443 inspections for the same time period. The difference is 106,488. This represents a loss of \$ 1,597,320 for the State Highway fund.

\*2022 is YTD through 3rd Quarter

\*\*Due to the pandemic state VIN facilities shut down 3/14/20 through 5/25/20

\*\*\*All counts for Adams County reported in District 4





**DIFFERENCE BETWEEN DOL INSPECTION FEE COUNTS AND VIN INSPECTIONS**

YEAR	TOTAL DOL COUNT	TOTAL VIP COUNT	TOTAL DIFFERENCE
2022*	11,636	32,663	21,027
2021	13,799	30,249	16,450
2020**	14,375	28,478	14,103
2019	18,955	34,545	15,590
2018	18,050	32,235	14,185
2017	18,728	30,956	12,228
2016	14,412	27,317	12,905
<b>TOTALS***</b>	<b>109,955</b>	<b>216,443</b>	<b>106,488</b>

\*2022 is YTD through 3rd Quarter

\*\*Due to the pandemic state VIN facilities shut down 3/14/20 through 5/25/20

**DISCUSSION**

Analysis of the data indicates that current VIN Program resources cannot meet the demand for inspections required by statute. Below is a list of the solutions, requirements of the solutions, and a high-level summary of Pros and Cons for each solution.

<b>Solution</b>	<b>Requires</b>
Add more VIN Officers	Legislative action Funding Training Time
Add more VIN Officers & VIN Facilities	Legislative action Funding Training Time Identify/Reopen/Rent/Build additional VIN facilities
Add Technology & Equipment	Legislative action Funding Training Time Changes in process
Reduce the Number/Type of Required Inspections	Legislative action Requires agreement with DOL to eliminate inspections Changes in process
Reassign Items which take Time from Inspections	Legislative action Funding Additional personnel Training Time Changes in process
Increase Efficiency/Reduce Time Needed for each Type of Inspection	Funding Consultation with efficiency experts Training Changes in process
Move VIN Inspection program to DOL	Legislative action Funding Substantial time and planning Hire more VIN Officers Training
Outsource VIN Inspection program	Legislative action Funding Substantial time and planning Oversight Training
Eliminate VIN Inspection program	Legislative action

### 1. Add more VIN Officers

**Pros:**

- Increased VIN inspections
- More manageable workload for VIN Officers
- Backlog of appointments reduced
- Increased revenue from inspection fees

**Cons:**

- None

### 2. Add more VIN Officers & VIN Facilities

**Pros:**

- Increased VIN inspections
- More manageable workload for VIN Officers
- Backlog of appointments reduced
- More locations available to the public
- Increased revenue from inspection fees

**Cons:**

- None

### 3. Add Technology & Equipment

**Pros:**

- VIN inspections likely take less time
- Increased VIN inspections likely

**Cons:**

- None

### 4. Reduce the Number/Type of Required Inspections

**Pros:**

- Overall workload reduced
- Backlog reduced
- Less training required for new hires

**Cons:**

- May increase levels of fraud eliminated from inspections
- Reduced revenue from inspection fees

## 5. Reassign Items which take Time from Inspections

### Pros:

- Increased VIN inspections
- More manageable workload for VIN Officers
- Backlog of appointments reduced
- Increased revenue from inspection fees

### Cons:

- None

## 6. Increase Efficiency/Reduce Time Needed for each Type of Inspection

### Pros:

- VIN Officers have been accumulating efficiencies since 2014
- Potential to perform more VIN inspections

### Cons:

- None

## 7. Move VIN Inspection program to DOL

### Pros:

- None for Washington State

### Cons:

- Disruption of the service during transition
- Loss of revenue to Highway account
- Loss to WSP of expertise, knowledge, and experience in VIN inspections over time
- Fixed Asset costs and maintenance of facilities remain though may be reduced, offset by rent, or part of the negotiation

## 8. Outsource VIN Inspection program

### Pros:

- None for Washington State

### Cons:

- Disruption of the service during transition
- Loss of revenue to Highway account
- Fixed Asset costs and maintenance of facilities remain though may be reduced, offset by rent, or part of the negotiation
- Over time costs may exceed previous cost of WSP VIN Program

- Requires oversight
- Loss to WSP of expertise, knowledge, and experience in VIN inspections over time

## 9. Eliminate VIN Inspection program

### Pros:

- None for Washington State

### Cons:

- Loss of revenue to Highway account
- Loss to WSP of expertise, knowledge, and experience in VIN inspections over time
- Fixed Asset costs and maintenance of facilities remain though may be reduced or offset by rent

## Retention

Retention of current staff is essential to the program because

- their specialized knowledge and experience are needed to train incoming staff,
- hiring efforts have been very time consuming and not very successful,
- and inspection appointments continue to be fully booked.

Experienced senior level VIN Officers train new staff while conducting their own inspections. Their mentorship and on-the-job training enable new officers to be effective more quickly. The faster new staff are trained the sooner VIN can meet the demand for more inspections.

The VIN Inspection Program retention of staff is at serious risk due to the pay level.

### 1. Pay Level

As of July 1, 2022, pay for an entry level WSP VIN Officer, classification 42E, is \$ 3,734 per month.

As of July 1, 2022, maximum pay for a WSP VIN Officer, classification 42M, is \$ 4,541 per month.

During the In-Service and in conversations with WSP Command Staff we learned

- An experienced VIN Officer said working harder was not as much of an obstacle as being asked to work even harder (after losing staff) at the current level of pay.
- A VIN Officer hired in April 2022 resigned within months of starting.
- Multiple VIN Officers have stated to management that they are looking for other positions which pay more.

Appendix 2 is the Office of Financial Management (OFM) Classified Job Specification for a VIN Officer,<sup>9</sup> the only job classification in the VIN Program after the 2001 reorganization. According to footnotes in the website record, this job description has not changed since it was created in 1997. WSP was told that a classification and comparison for the positions needed in the VIN Program will not be available until the 2025-2027 Biennium.

The VIN Program staffing needs must be addressed now to retain the current staff. There have been no staffing or pay changes for 22 years. See *Recommendations* for the staff level and structure.

The VIN Program Manager, in the course of retention evaluation and recruiting activities, researched and recommended the following pay structure for both current and incoming staff:

Position	Monthly Pay*	Annual Pay*
VIN Officer 3	\$ 5,268	\$ 63,216
VIN Officer 2	\$ 4,777	\$ 57,324
VIN Officer 1	\$ 4,216	\$ 50,592
Reallocated Program Specialist	\$ 5,813	\$ 69,756
Administrative Assistant	\$ 4,216	\$ 50,592

\* Does not include the King County supplement

## 2. Increase in Workload

The number of completed inspections per officer has increased 133% since 2009. This is evidence of how hard VIN Officers are working to make up for the loss in staff. Adding additional staff will reduce the workload, which has been considered unmanageable since 2014.

VIN Officers' primary responsibility is inspections. Anything else that takes their time, such as responding to phone and email complaints, should be reassigned to someone else. An Administrative Assistant (as the dedicated **customer facing** VIN Help Desk) could receive, manage, report, and respond to complaints for a minimum period of two years. This will result in an immediate increase in available inspection appointments and relieve the officers' workloads. This position could also manage the facility scheduled appointments each week, removing any duplicate appointments created by the same person or for the same vehicle. Reports may need to be added to the scheduling software to help manage the calendars.

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<sup>9</sup> VIN Officer Current Pay Scale

### **3. Evaluation and Supervision**

When the VIN staff was reduced in 2001 the VIN Supervisor positions were eliminated. Since then, Detective Sergeants from the Criminal Investigation Division (CID) have served in rotation as supervisors for VIN Officers.

- Detective Sergeants have other, often higher priority tasks
- Detective Sergeants are often not experienced in VIN inspections

Reinstating the dedicated VIN Supervisor positions would reassure VIN Officers that they are supported by supervisors who understand all the elements of VIN and who are experienced in the issues they encounter on the job.

### **4. Career Advancement**

Prior to 2001 the structure of the VIN Program structure was

VIN Officer 1  
VIN Officer 2  
VIN Officer 3 (Supervisor)

Once the tiers were eliminated there is no means to promote within this job classification. Both retention and recruiting would be improved by reinstating the tier structure, which would provide a career opportunity for advancement with pay increases. Four VIN Supervisors would be responsible for two WSP Districts each to cover the geography. These positions will require substantial travel throughout their districts. Supervisors will stand in for a VIN Officer who is ill or on vacation. Today VIN Officers often work while sick, because cancelling an entire day of appointments is so disruptive and disappointing to the public.

Feedback from the In-Service brought to our attention that in the last nine years there have been seven different Lieutenants as VIN Program Managers. Five of the seven came to VIN with no VIN experience. Every change of Program Manager requires at least several months to understand the VIN Program and the challenges it faces. Short tenure of Program Managers makes it difficult if not impossible to implement improvements to the program. This reinforces the importance of dedicated VIN Supervisors who can maintain the vision, provide stability for the program, and help Lieutenants/Program Managers implement changes needed to sustain the VIN Program.

### **5. Working Conditions**

A number of the outlying VIN facilities have no VIN lane or building where inspections are conducted; they are performed in the parking lots of detachment WSP offices. Is it acceptable to ask someone to work in the elements with no shelter from sun, heat, rain, wind, lightning, snow, or traffic, and no convenient place to store their work tools?

The VIN calendar is not adjusted for the weather. The program needs to buy or build a shelter/metal building/garage to be installed at the WSP “parking lot” facilities.

Another aspect of working conditions is personal safety. Many VIN Officers work alone in facilities. Concerns about feeling safe in the workplace have been expressed. It was reported that members of the public have crawled under nearly closed garage doors to gain access to the VIN lane. A report from the WSP In-Service was very concerning. A VIN Officer had left the VIN building to use the restroom facilities in the WSP office across the parking lot. Upon return he found a member of the public had ignored the “Employees Only” sign and walked into the office. His colleague was completely unaware of the intruder. When the ding indicated the opening of the door the Vin Officer thought it was his colleague returning from the restroom.

Safety issues apply to the public as well. Drivers and their passengers may be asked to leave their vehicle during the inspection. In some locations the public must wait outside, and may risk encounters with reptiles, large spiders, and wildlife.

## **6. Appreciation**

Appreciation is one of the fundamentals for retention of employees. Everyone wants to be recognized and lauded. Every WSP Annual Report since 2018 reports the metrics, accomplishments, and milestones of the Commercial Vehicle Enforcement Officers (CVEO) and the Criminal Investigation Division (CID). There was mention of the increase in the total number of inspections completed in 2021. Additional highlights of graduation from VIN Basic Training, the In-Service gathering, VIN metrics, milestones, and accomplishments should be published similar to the CID and CVEO in department publications and social media.

## **Recruiting**

New staff are required to meet the current demand for inspection appointments. Data analysis reveals that the current staff of 13 full time and 1 half time VIN Officers conduct an increasing number of inspections each year. Without additional staff Washingtonians who require a VIN inspection will continue to experience prolonged wait times for an appointment. As more staff are hired and trained, the calendar of appointments can be gradually opened for longer periods to gauge and monitor the demand. Once demand levels out the staff level may be reevaluated.

### **1. Pay**

Feedback from previous job candidates was negative about the pay level. As mentioned, it took more than five rounds of advertising to find qualified candidates who agreed to the job and pay.



## **2. Working Conditions**

People want to feel safe and protected at their job. Feedback from recent job candidates was very negative about working in a facility parking lot for inspections. It is important that basic safety features and shelter from the elements are available in every location.

## **3. Career Advancement**

The lack of career advancement as a VIN inspection officer was another source of dissatisfaction mentioned by recent job candidates. Reestablishment of the VIN tier structure described above would enhance recruiting efforts. It is important to any worker that the person who supervises them and evaluates their work understands their job, what they do, and can properly guide their career.

## **Training**

VIN facilities have a level of autonomy which can lead to compartmentalization of information. Creating, maintaining, and supporting a culture of sharing information makes VIN a stronger and more qualified program. Consistency in both information and training was a topic at the In-Service.

### **1. Codify the Knowledge**

The VIN Inspection Program utilizes an uncommon and specialized subject matter for vehicle inspections. Much of the training is on-the-job, provided by senior level VIN Officers. There are common assumptions that on-the-job training implies a job which is of less value than a job with formal education and certification. One recommendation is to create a formal electronic library of VIN training subjects, including the VIN Manuals and instructional videos. These training materials will provide consistent instruction for every trainee. Ideally VIN will engage the WSP Training Division for assistance. HR should be advised to consider how these training resources enhance the position in the reexamination of the classified job specification.

### **2. Shared Book of Knowledge**

During the In-Service VIN Officers gave presentations of information and examples from their facilities of faked/forged/reused invoices, cosmetic vs. replace/repair, dealers who are not operating in good faith, clones and other title issues. These should be collected into an online VIN Book of Knowledge, an online repository of shared information, such as identifying curb stoners and lane shoppers. The Book of Knowledge would be updated constantly. The storage tool for this shared information may have an automated process to notify officers when an update has been made.

### **3. Training versus Inspections**

When new staff are hired senior level VIN Officers train the new hires. This will, to some extent, reduce the time the senior level officers have available to

conduct inspections. This creates a trade-off between training and inspections. Geography complicates this further, as trainees must train where the senior level officers are located. VIN Supervisors can, when and where possible, conduct inspections in the locations where training is held, to maintain the typical level of inspection appointments.

#### **4. Potential Risk to Training**

Retention of experienced senior level VIN Officers is important for the viability of VIN to train new staff. Identify these officers and create videos of their instructions to mitigate the loss when these valuable trainers leave the program.

#### **5. Plan for the Future**

At some point the current senior level VIN Officers will retire from VIN. In anticipation of that, identify potential replacements for these trainers and enable them to learn from senior level staff before they leave the program. Plan how the best candidates can become trainers. Consider who is capable of a “Train the Trainer” role. The WSP Training Division may have valuable advice to contribute toward this plan. If not, the Washington State Learning Center has a Learning Management System (LMS) and can assist VIN with training and educational needs.

Dedicated VIN Supervisors will play a key role in managing the ongoing training needs. “On-the-ground” supervisors are in the best position to observe and understand the challenges and forces of change for the VIN Program.

#### **6. Leverage VIN Basic Training**

VIN Basic Training is an intensive one-week certification course provided by VIN for both VIN Officers and other agencies who need the training. The course is scheduled annually, or on demand when there are enough new staff to warrant it. This formal training enhances the credentials of graduates of the course and distinguishes them with unique experience. VIN should leverage the power of the VIN Basic Training course. Advise HR to consider completion of this specialized training in the reexamination of the VIN Officer classified job specification.

### **Potential Efficiencies**

Through in-person observations, interviews, and correspondence with individual VIN Officers, the VIN Help Desk Officer, the VIN Program Manager, detective sergeants, and the WSP Command Staff processes used by the VIN Officers in the course of their work were documented. Analysis of these observations revealed the areas where increased efficiency can be achieved. Appendix 3 contains the documented procedures.

### **1. Redirect VIN Lane Emails and Phone Calls**

The greatest efficiency to be gained is to eliminate handling of complaint phone calls and emails to VIN facilities by VIN Officers. This can be achieved by redirecting/forwarding the VIN facility email address to the central designated VIN email address. Then only email addressed directly to VIN Officers will arrive in their email boxes.

The same method can be used to forward the VIN facility telephone number to the appropriate VIN phone number.

These steps would free VIN Officers for as much as 2 to 20 hours a week to complete inspections and should have a measurable effect in reducing demand for inspection appointments. Anything that takes officers' time from inspections should be minimized, reassigned, or eliminated.

### **2. VIN Tag Printers**

The VIN Program currently uses very old typewriters to record new VIN numbers on the VIN tags to be applied to the vehicle. The VIN tags are very expensive, and it is easy to make mistakes and waste a tag. New printers are available which print the new VIN on the tag on demand and with less opportunity for error. VIN Officers' recommendation is this technology would provide much greater efficiency over the current process and prevent wasting tags. The VIN tag product is also more professional in appearance than what is currently used. Funding is needed to replace the typewriters with modern printers which will save both time and money, and eliminate waste of tags along with increasing the professionalism of the VIN tag appearance.

### **3. Additional Equipment**

VIN Officers use paper forms and clipboards during the examination of vehicles. They put the paperwork and clipboard down several times during the inspection. They write notes and then type the information into the computer in the office. Efficiency could be achieved by purchasing mobile carts and laptops or tablets, keyboards and a mouse firmly attached to the cart. The cart is the style auto mechanics use in a repair bay. This would allow data entry of the notes during the inspection. If the information being recorded is sensitive or should be shielded from the driver and any passengers, the officer could enter the office when necessary.

Smartphones can be used to photograph any aspect of the vehicle. If photos need to be saved in CITE, special cables can transfer photos directly from the phone to the computer or tablet hard drive, which would be much more efficient than emailing photos to oneself. Funding is needed for these basic pieces of equipment which will result in greater efficiency during inspections.

### **VIN Help Desk Officer**

The current VIN Help Desk Officer primarily serves VIN, other Washington agencies, and other states. They are an encyclopedia-like resource for VIN Officers who have questions. The VIN Help Desk Officer liaises with DOL and other states for investigations into title issues, auto theft, ownership-in-doubt issues, fraudulent title schemes, cloned VINs, and other VIN identification issues. They also assist with responses to the public for complaints.

The responsibilities for this position are not properly reflected in the current VIN Officer job description. This position should be reclassified, likely as a Program Specialist. Reallocation of this position should not reduce the number of VIN Officers who conduct inspections full time.

1. The current Help Desk Officer is a senior level staff member, one of two senior level staff who conduct the 40-hour VIN Basic Training.
2. In addition to daily phone calls and emails for questions and ongoing investigations the Help Desk officer opened 750 new investigation case folders in 2021. Twenty-five of those cases were cloned vehicle investigations, which can take months, sometimes years to complete. In 2022, after two months of leave, the officer opened 450 new investigation case folders, twenty-nine of which are for cloned vehicles. These figures give a sense of how much work is performed by this one officer.
3. Retention is at risk for this officer due to the number of years' experience with VIN. There is no VIN Officer in training to replace the current VIN Help Desk Officer. Create a plan to identify how best to preserve this officer's information and train a potential replacement.

## **QUESTIONS FOR DISCUSSION**

### **VIN Inspection Program Funding**

The VIN inspection fee is \$ 65. Recent changes now distribute the entire \$ 65 to WSP for each inspection. WSP's share goes directly into the state Highway fund. The VIN Program submits a budget to WSP for funding each year. No funding is specifically dedicated to the VIN Inspection program.

VIN is responsible for maintenance and improvements to the VIN inspection facilities, including janitorial services, utilities, landscaping, building maintenance and repairs such as roofs, equipment such as lifts and garage doors, HVAC, plumbing, security cameras, and signage. Funding is inadequate for necessary facilities maintenance and improvements. Improvements to the "parking lot" facilities cannot be made without additional funding. VIN requests for Capital Improvements funding often fall too low in priority for approval.

The RCWs and WACs which require VIN inspections are "owned" by DOL. WSP VIN has no control over the types of inspection to perform or how much to charge for an inspection fee, yet it is responsible for supplying, equipping, and maintaining all the personnel, equipment, tools, and facilities for VIN inspections.

### **VIN Scheduling Software**

Prior to the shutdown of all VIN facilities in 2020 there were few issues with the SuperSaas calendar software. After 11 weeks of shutdown the demand for appointments pushed availability far into the year, causing complaints.

To relieve the public's frustration with scheduling appointments the VIN inspection calendar was changed to a rolling 5-week schedule which opens every Tuesday at 11 am. All open appointments at every facility are booked within minutes. This change allows people who could not obtain an inspection appointment this week to try again next week. VIN Officers review their facility schedule and delete duplicate appointments made for the same person or vehicle.

VIN engaged in extensive conversations with the SuperSaas vendor to explore any options, configuration changes, or upgrades which might improve issues with scheduling. VIN uses the latest version of the software. No changes to the software will create more appointments. The limiting factor is lack of VIN Officers, not the scheduling software.

VIN staff researched other software but have found no affordable alternatives. DOL uses DRIVES software for the entire licensing operation which includes a scheduling module. VIN has not investigated whether the scheduling module of DRIVES can be used independently.

There is no software remedy for the overwhelming demand for appointments that VIN experiences. Increasing the number of VIN Officers is the only way to increase available inspection appointments.

## **VIN Inspection Program – Washington State Patrol versus Department of Licensing**

VIN inspections are conducted per requests from DOL. This has raised the question: Should the VIN inspection program remain within WSP or be moved to DOL?

### **Points to consider:**

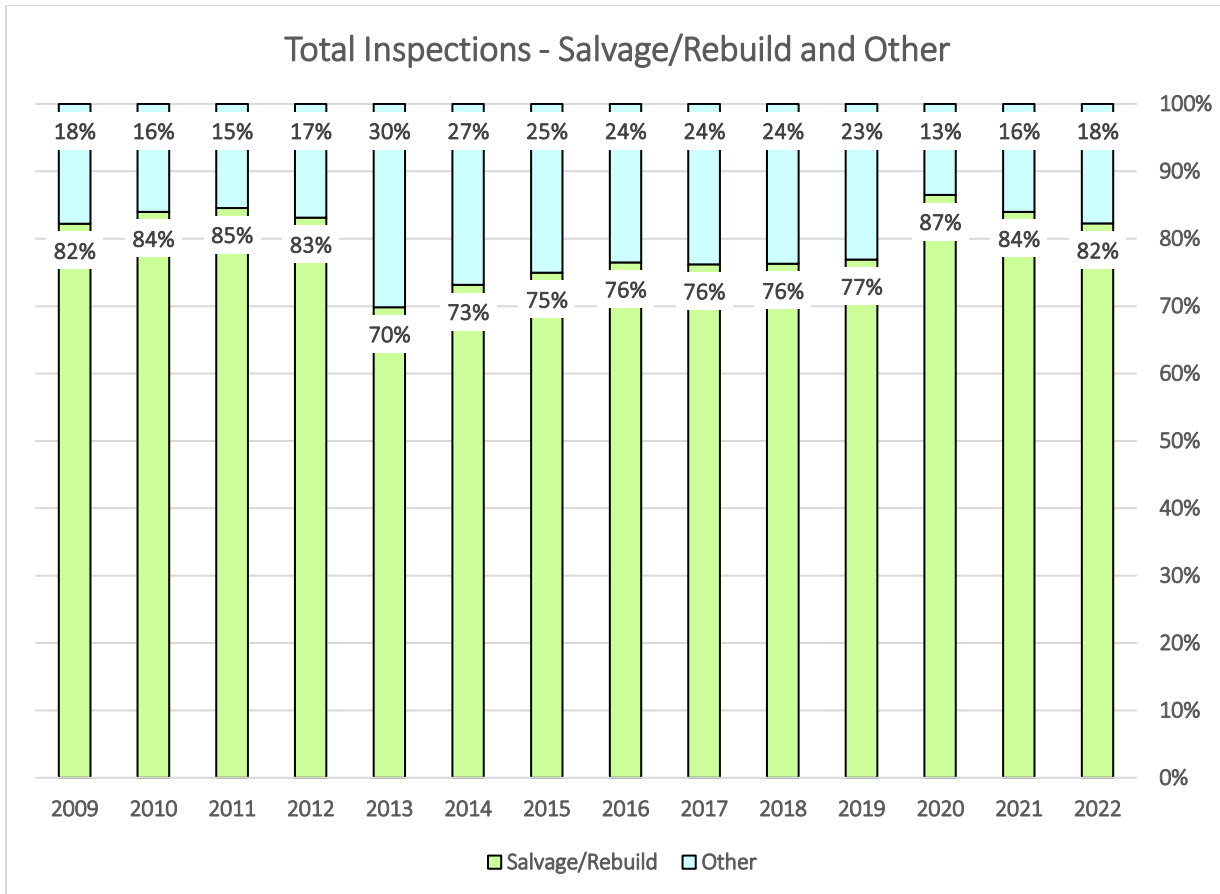
1. The VIN inspection program was created within WSP in 1972 to perform physical vehicle inspections required by law.
2. WSP owns all but one of the existing inspection facilities.
3. Physical infrastructure at the facilities such as phone systems, email, power, water, etc., are closely integrated with the infrastructure of the attached or adjacent WSP offices.
4. The logistics of moving VIN to DOL and the effects on performing inspections during the transition period.
5. Transitioning, if possible, the data now collected in WSP's system of record CITE to DOL's DRIVES system of record.
6. Whether DOL can properly conduct inspections without access to search CITE historical data.
7. How to apportion the costs of moving the VIN program to DOL?
8. Retention of staff. It is possible, given the long history with WSP, that current staff will leave if the program is moved to DOL. That would result in reduced number of inspections or total cessation of the program until such time as DOL can operate it.
9. Will DOL subagents conduct VIN inspections? What safeguards will be in place to ensure competence?
10. DOL has experienced reductions in staffing. Who would manage the VIN program? What training would they need before the transition?
11. Limited access to sensitive data sources, such as WACIC, NCIC, Copart, IAA, and others may impact DOL's ability to support the program. Some are only available to law enforcement agencies.
12. Per RCW 46.12.560 5 (C) and (D) WSP currently owns the process to assign and/or replace the VIN number of a vehicle. Would this authority transfer to DOL? What safeguards will be in place to ensure competence and deter corruption?
13. It is a Class C Felony to remove, obscure, or otherwise deface the VIN number of a vehicle and its parts. Will DOL have access required to report this to law enforcement?
14. Will DOL be able to support Washington and other state agencies in criminal investigations which relate to, or rely upon, in depth VIN experience?
15. Changes to all the related RCWs and WACs would be required.
16. Is it a potential conflict of interest if the agency which requires the inspections also conducts the inspections? Legal advice may be required to answer this.

## Reduce the Number of Required Inspections per RCW 46.12.560

Analysis of types of inspections from CITE is shown in the chart below. The data was grouped as *Salvage/Rebuild* and *Other*, due to the small numbers of each of the “other” categories.

*Salvage/Rebuild* inspections comprise 82% of all inspections performed in 2022 YTD. The percentage of all the remaining types of inspections required by RCW 46.12.560 is 18% in 2022. These percentages were 87% *Salvage/Rebuild* versus 13% *Other* in 2020.

One way to significantly reduce the number of required inspections is to work with DOL to create a moratorium of non-salvage/rebuild vehicles for one year. DOL would issue a one-year permit to allow use of these non-salvaged vehicles without a VIN inspection. This would reduce required inspections by for the next year by 16-20%. Eliminating types of inspections will result in a corresponding decrease in VIN inspection fees. VIN inspections would be required when the one-year permits expire.



## Dealerships – Dealer Attestation

Dealers who purchase and rebuild salvaged vehicles are required to obtain a physical VIN inspection to obtain a *Rebuilt* vehicle title prior to sale of the vehicle.

One way to significantly reduce the number of required inspections is to eliminate physical VIN inspections for dealerships. In lieu of inspections dealers would self-attest that they have properly repaired/rebuilt salvaged vehicles and used properly documented parts to repair/replace the major component parts of salvaged vehicles. Dealership inspections accounted for 40% of total inspections in 2020, 42% in 2021, and 43% through 2022 YTD.

### Points to consider:

1. The increasing number of VIN inspections reflects the increasing number of salvaged/rebuilt vehicles being sold.
2. Dealership inspections are more efficient than private inspections because dealers are typically prepared with all the required paperwork for the inspection.
3. VIN has not recorded or tracked the number of inspections denied due to fraudulent documentation or improper repairs. Steps are being taken to redress this information gap. For this reason, the volume of this type of fraud it is currently unknown.
4. VIN is aware, based on prior experience, that some dealerships would use self-attestation to take advantage of the situation in absence of physical inspections.
5. How would the state administer enforcement for self-attesting dealers? Would randomly selected physical inspections be required? Who would administer enforcement and how would that be accomplished?
6. What penalties would be issued to dealerships in violation of the statutes? Would the penalties be deterrent enough to limit risks to the public for the presence of non-road worthy vehicles?
7. How would self-attestation be administered? Per vehicle? Per dealership location? Per dealership?
8. Would the attestation be notarized? Self-attestation would require specific definition of the process.
9. Self-attestation would result in loss of nearly half the revenue to the Highway account from inspection fees. Would another fee replace the vehicle inspection fee? How would that be determined and who would administer it? Who would receive payment and where would the funds be allocated?



## RECOMMENDATIONS

Recommendations for the VIN program are based on the analysis of information and data gathered during this assessment.

The current resource level is insufficient to meet the demand. Therefore, retention of the current staff and hiring additional staff immediately is key to resolving issues for VIN.

The data indicates the appropriate number of VIN Officer positions dedicated to full time inspections should be between 39 and 41. If the 5 non-permanent positions are made permanent then VIN currently has 21.5 VIN Officer positions. The recommendation is to hire an additional 19 permanent VIN Officers devoted to full time inspections. This recommendation nearly doubles the number of VIN Officers, which is commensurate with the increase in the number of inspections performed. As documented above, the trend is that the demand for inspections will continue to increase in the future.

### **Immediate Recommendations: To implement immediately**

1. Stabilize, increase, and retain the workforce. Take the following steps to ensure that the current staff have incentive to remain with the program and that new recruits have incentive to join the program.
  - Reinstated and define the VIN Program tier structure:
    - VIN Officer Level 1
    - VIN Officer Level 2
    - VIN Officer Level 3 (VIN Supervisor)
  - Convert the five non-permanent positions to permanent positions.
  - Increase pay levels for each position.
  - Hire 19 VIN Officer Level 1 full time.
  - Promote eight existing VIN Officers to VIN Officer Level 2.
  - Hire/Promote four VIN Officer Level 3 supervisors and assign two WSP Districts to each.
  - a. Reallocate the current VIN Help Desk Officer to a new position commensurate with the job duties and responsibilities of a Program Specialist.
    - Hire a customer facing VIN Customer Service Representative for a 2-year position to receive, monitor, report, and respond to complaints about VIN. Establish quarterly evaluations of complaint volume and activity.
    - Forward the VIN facility email to the centralized VIN Customer Service email address to free VIN Inspection Officers for inspections.
    - Forward the VIN facility phone to the centralized VIN Customer Service phone number to free VIN Inspection Officers for inspections.
    - Total staffing and pay level should be:

Position	Quantity	Monthly Pay*
VIN Officer 3	4	\$5,268.00
VIN Officer 2	8	\$4,777.00
VIN Officer 1	32	\$4,216.00
Reallocated Program Specialist	1	\$5,813.00
Administrative Assistant	1	\$4,216.00

\*Does not include the King County supplement

2. Stabilize Funding for the Program
  - Propose changing the legislation to allow WSP to define and change the types of VIN inspections to conduct.
  - Propose changing the legislation to allow WSP to define and change the VIN Inspection fee.
  - Propose changing the legislation to distribute the entire VIN inspection fee to the VIN Program paid into a VIN Facilities Management fund dedicated for the cost of VIN facility repairs, improvements, and replacements.
  
3. Reduce the number of required inspections temporarily, coordinating with DOL to place a one-year moratorium on any non-salvaged vehicle inspection. This would immediately reduce the demand for inspections by 17-20%. DOL can issue one-year temporary permits for the excluded vehicles to be allowed on the roadways. One the permits expire a VIN inspection would be required before the title is issued.
  
4. Propose legislation to fund the research, selection, installation, integration, testing, training, implementation, and support for a secure payment system to accept the VIN inspection fees.
  
5. Purchase new VIN tag printers and install at every facility.
  
6. Purchase equipment rolling carts equipped to securely hold laptops or tablets, keyboards and mouse, purchase the laptops/tablets, keyboards, mice for the carts and install at every facility.
  
7. Gather feedback from VIN Program staff to evaluate the impact of program changes. Document the suggestions and plan the responses. Address these at or before the next in-service gathering.

### **Year 1 Recommendations: To implement within the next year**

1. Create/assemble and maintain an online library of training materials for VIN Inspections, to document program knowledge and standardize consistent training across the VIN Program. Use the library to assign training topics to incoming VIN Officers. The addition of formal training will improve consistency and lessen the burden of on-the-job training with senior VIN Officers.

2. Maintain a centralized online shared repository with automated notifications of relevant information regarding knowledge of
  - Repair shops and dealers who fabricate fraudulent receipts for Major Component Parts
  - Curb Stoners (persons who sell more than four vehicles in 12 months without a Dealer license)
  - Identification of individuals and dealers who "shop" VIN Lanes as a means of avoiding detection of fraud, theft, or abuse
  - Identification of out-of-state schemes of fraudulent titles or cloned VIN activity
  - New and additional means of avoiding detection of fraud, theft, and abuse
3. Promote the use of the repository to both new and seasoned VIN Officers to share knowledge gained and further train new officers. VIN Trivia contests with small prizes would be a fun way to engage the officers and promote teamwork.
4. Evaluate the inventory of VIN facility's needs. Prioritize and remedy as many as possible in Year 1.
5. Design a means to capture citizen feedback of satisfaction with the VIN Inspection Program, implement and report feedback to VIN Supervisors and Command Staff
6. Gather feedback from VIN Program staff to evaluate the impact of program changes. Document the suggestions and plan the responses. Address these at or before the next In-Service gathering.

## **Year 2 Recommendations – To implement in the following year**

1. Evaluate VIN Program stability
  - Determine whether pay increases and position changes have been sufficient to retain the current VIN Officers.
  - Evaluate whether pay increases and revised job descriptions have attracted new VIN Officers.
  - Evaluate whether the level of complaints has been reduced after the addition of new staff and continue to monitor.
  - Gradually open the VIN Inspection Appointment Calendar to determine whether the backlog for appointments has been fully addressed.
2. Establish an ongoing collaboration with DOL on necessary VIN inspections, whether changes to inspections or categories of inspections are needed, and document findings
3. Begin the research of other scheduling calendar software used by Washington state agencies and consider whether purchasing or sharing a software license with another agency is feasible.

If not, extend the research to determine the best solution for the VIN Program. Integration with a payment system will be key for maximum efficiency.

4. Inventory each VIN facility for
  - Maintenance and deferred maintenance needs
  - Safety/Security needs such as internal and external security cameras and recorders, internal and external mirrors, defined procedures and responses if an emergency situation occurs
  - Make upgrades to existing facilities including
    - Whether to install structures at facilities with no VIN lane or protection from the elements OR move the inspections to an existing VIN lane within the WSP District
    - Additional signage where needed
    - Evaluate public safety at facilities particularly where there is exposure to traffic, weather elements, and wildlife
    - Evaluate safety of exposure of VIN Officers by the public (lobbies within VIN offices, security features at facilities such as signage and locked doors, response procedures to Panic Button, etc.)
    - Request funding for these needs until the management of VIN facilities is funded by the VIN inspection fees.
5. Evaluate the volume of VIN Program complaints and report progress to Command Staff and VIN Supervisors of
  - Current level of complaints (including categories)
  - Current response time for complaints
  - Estimated satisfaction of handling of complaints based on citizen feedback
6. Evaluate whether the 2-year Administrative Assistant position for Customer Service should be extended or made permanent
7. Evaluate how the Program Specialist will train eventual replacement and determine the training time needed for overlapping employment
8. Continue capturing citizen feedback of satisfaction with the VIN Program, implement and report feedback to VIN Supervisors and Command Staff
9. Gather feedback from VIN Program staff to evaluate program changes. Share and discuss at the annual In-Service gathering.

### **Years 3-5 Recommendations – to implement in 3-5 years**

1. Evaluate and identify needs in the CITE system of record software such as
  - Additional fields or field values needed for new categories of inspections and corresponding changes to WSP Statement of Fact document

- Consistency of CITE system with categories and types in DOL systems
  - Reporting needs from CITE for management and supervisors
  - Automate delivery of standard reports from CITE for management and supervisors
  - Establish the evaluation/identification of needs as an ongoing process
2. Complete the research for replacement calendar software and secure funding to purchase, integrate, and implement if needed.
  3. Consider whether establishing an electronic exchange of information with DOL is feasible and if so, would create efficiencies, and reduce costs
  4. Complete any safety, maintenance and/or improvements to VIN facilities remaining from Year 2 recommendations
  5. Continue to evaluate hiring and staff retention efforts for any adjustments needed
  6. Continue capturing citizen feedback of satisfaction with the VIN Inspection Program, implement and report feedback to VIN Supervisors and Command Staff
  7. Gather feedback from VIN Program staff to evaluate program changes. Discuss at the annual In-Service gathering.

## CONCLUSION

There is a single issue to be resolved - there are not enough VIN Officers to complete all the inspections required by statute, because the number of positions for the VIN Program has remained the same for 22 years. There are issues of low pay and lack of career advancement for both retention of current staff and recruiting for the vacancies of three replacement VIN Officers and five non-permanent officers. The workload has exceeded the staff's ability to complete all inspections since 2014, as concluded by Program Manager Lieutenant Ashley in 2018. The workload per VIN Officer has increased substantially since 2018. The chart below details the increase in number of inspections conducted in 2014, 2018, and in 2022.

Year	Total Inspections	Inspections Per Officer	Increase Per Officer since 2014
2022	32,662	2,419	915
2018	32,235	1.954	450
2014	24,811	1,504	

The data reflects the level of effort made to meet the demand, consistently increasing the number of inspections completed per VIN Officer every year.

An increase in staffing will immediately increase the number of inspection appointments. The ability to both increase and retain the staff will require higher pay and a path to career advancement. Younger candidates have expressed a desire for a job with a future.

In 2022 salvaged vehicles represented 82% of all inspection types. A temporary means to reduce the number of inspections is to coordinate with DOL and create a moratorium on any non-salvaged vehicle inspections for one year, reducing the current workload by an estimated 17-20%. This will allow time to hire and train new VIN Officers, potentially without adding further to the existing backlog for inspections.

## APPENDICES

**APPENDIX 1 – RCW 46.12.560**

**RCW 46.12.560 Inspection by state patrol or other authorized inspector.** (1) (a) Before accepting an application for a certificate of title, the department, county auditor or other agent, or subagent appointed by the director shall require an applicant to provide a certificate of vehicle inspection completed by the Washington state patrol or other authorized inspector if the vehicle:

(i) Was declared a total loss or salvage vehicle under the laws of this state;

(ii) Has been rebuilt after the certificate of title was returned to the department under RCW 46.12.600 and the vehicle was not kept by the registered owner at the time of the vehicle's destruction or declaration as a total loss; or

(iii) Is presented with documents from another state showing that the vehicle was a total loss or salvage vehicle and has not been reissued a valid registration certificate from that state after the declaration of total loss or salvage.

(b) A vehicle presented for inspection must have all damaged major component parts replaced or repaired to meet all requirements in law and rule before the Washington state patrol will inspect the vehicle. The inspection must verify that the vehicle identification number is genuine and agrees with the number shown on the certificate of title and registration certificate.

(c) A Washington state patrol vehicle identification number specialist must ensure that all major component parts used for the reconstruction of a salvage or rebuilt vehicle were obtained legally, and must securely attach a marking at the driver's door latch pillar indicating the vehicle was previously destroyed or declared a total loss. It is a class C felony for a person to remove the marking indicating that the vehicle was previously destroyed or declared a total loss.

(2) A person presenting a vehicle for inspection under subsection (1) of this section must provide original invoices for new and used parts from:

(a) A vendor that is registered with the department of revenue or a comparable agency in the jurisdiction where the major component parts were purchased for the collection of retail sales or use taxes. The invoices must include:

(i) The name and address of the business;

(ii) A description of the part or parts sold;

(iii) The date of sale; and

(iv) The amount of sale to include all taxes paid unless exempted by the department of revenue or a comparable agency in the jurisdiction where the major component parts were purchased;

(b) A vehicle wrecker licensed under chapter 46.80 RCW or a comparable business in the jurisdiction outside Washington state where the major component part was purchased; and

(c) Private individuals. The private individual must have the certificate of title to the vehicle where the parts were taken from unless the parts were obtained from a parts car owned by a collector. Bills of sale for parts must be notarized and include:

(i) The names and addresses of the sellers and purchasers;

(ii) A description of the vehicle and the part or parts being sold, including the make, model, year, and identification or serial number;

(iii) The date of sale; and

(iv) The purchase price of the vehicle part or parts.



SALARY RANGE		STEP A	STEP B	STEP C	STEP D	STEP E	STEP F	STEP G	STEP H	STEP I	STEP J	STEP K	STEP L	STEP M*
39	Annual	38004	38952	39852	40812	41760	42696	43800	44808	45852	46980	48156	49404	50592
	Monthly	3167	3246	3321	3401	3480	3558	3650	3734	3821	3915	4013	4117	4216
	Hourly	18.20	18.66	19.09	19.55	20.00	20.45	20.98	21.46	21.96	22.50	23.06	23.66	24.23
	Standby	1.27	1.31	1.34	1.37	1.40	1.43	1.47	1.50	1.54	1.58	1.61	1.66	1.70
40	Annual	38952	39852	40812	41760	42696	43800	44808	45852	46980	48156	49404	50592	51888
	Monthly	3246	3321	3401	3480	3558	3650	3734	3821	3915	4013	4117	4216	4324
	Hourly	18.66	19.09	19.55	20.00	20.45	20.98	21.46	21.96	22.50	23.06	23.66	24.23	24.85
	Standby	1.31	1.34	1.37	1.40	1.43	1.47	1.50	1.54	1.58	1.61	1.66	1.70	1.74
41	Annual	39852	40812	41760	42696	43800	44808	45852	46980	48156	49404	50592	51888	53100
	Monthly	3321	3401	3480	3558	3650	3734	3821	3915	4013	4117	4216	4324	4425
	Hourly	19.09	19.55	20.00	20.45	20.98	21.46	21.96	22.50	23.06	23.66	24.23	24.85	25.43
	Standby	1.34	1.37	1.40	1.43	1.47	1.50	1.54	1.58	1.61	1.66	1.70	1.74	1.78
42	Annual	40812	41760	42696	43800	44808	45852	46980	48156	49404	50592	51888	53100	54492
	Monthly	3401	3480	3558	3650	3734	3821	3915	4013	4117	4216	4324	4425	4541
	Hourly	19.55	20.00	20.45	20.98	21.46	21.96	22.50	23.06	23.66	24.23	24.85	25.43	26.10
	Standby	1.37	1.40	1.43	1.47	1.50	1.54	1.58	1.61	1.66	1.70	1.74	1.78	1.83
43	Annual	41760	42696	43800	44808	45852	46980	48156	49404	50592	51888	53100	54492	55872
	Monthly	3480	3558	3650	3734	3821	3915	4013	4117	4216	4324	4425	4541	4656
	Hourly	20.00	20.45	20.98	21.46	21.96	22.50	23.06	23.66	24.23	24.85	25.43	26.10	26.76
	Standby	1.40	1.43	1.47	1.50	1.54	1.58	1.61	1.66	1.70	1.74	1.78	1.83	1.87
44	Annual	42696	43800	44808	45852	46980	48156	49404	50592	51888	53100	54492	55872	57324
	Monthly	3558	3650	3734	3821	3915	4013	4117	4216	4324	4425	4541	4656	4777
	Hourly	20.45	20.98	21.46	21.96	22.50	23.06	23.66	24.23	24.85	25.43	26.10	26.76	27.45
	Standby	1.43	1.47	1.50	1.54	1.58	1.61	1.66	1.70	1.74	1.78	1.83	1.87	1.92
45	Annual	43800	44808	45852	46980	48156	49404	50592	51888	53100	54492	55872	57324	58704
	Monthly	3650	3734	3821	3915	4013	4117	4216	4324	4425	4541	4656	4777	4892
	Hourly	20.98	21.46	21.96	22.50	23.06	23.66	24.23	24.85	25.43	26.10	26.76	27.45	28.11
	Standby	1.47	1.50	1.54	1.58	1.61	1.66	1.70	1.74	1.78	1.83	1.87	1.92	1.97
46	Annual	44808	45852	46980	48156	49404	50592	51888	53100	54492	55872	57324	58704	60156
	Monthly	3734	3821	3915	4013	4117	4216	4324	4425	4541	4656	4777	4892	5013
	Hourly	21.46	21.96	22.50	23.06	23.66	24.23	24.85	25.43	26.10	26.76	27.45	28.11	28.81
	Standby	1.50	1.54	1.58	1.61	1.66	1.70	1.74	1.78	1.83	1.87	1.92	1.97	2.02
47	Annual	45852	46980	48156	49404	50592	51888	53100	54492	55872	57324	58704	60156	61632
	Monthly	3821	3915	4013	4117	4216	4324	4425	4541	4656	4777	4892	5013	5136
	Hourly	21.96	22.50	23.06	23.66	24.23	24.85	25.43	26.10	26.76	27.45	28.11	28.81	29.52
	Standby	1.54	1.58	1.61	1.66	1.70	1.74	1.78	1.83	1.87	1.92	1.97	2.02	2.07

Standby rate is equal to 7% of the hourly rate

\*All employees will progress to Step M six (6) years after begin assigned to Step L in their permanent salary range.



## **APPENDIX 2 – WASHINGTON STATE OFFICE OF FINANCIAL MANAGEMENT CLASSIFIED JOB DESCRIPTION – VIN OFFICER**

State of Washington Classified Job Specification  
**VEHICLE IDENTIFICATION NUMBER OFFICER**

<< Classified Job Listing  
VEHICLE IDENTIFICATION NUMBER OFFICER  
Class Code: 454E  
Category: Regulatory Services  
Salary Range: 42

### **Definition**

Performs inspections of confidential vehicle identification numbers (VINs) to confirm vehicle identity and the authenticity of public VINs. Performs chemical or heat processing to restore altered or obliterated VINs, and imprints the state logo into VIN plates.

### **Distinguishing Characteristics**

VIN inspection positions in this class have agency designated authority to receive confidential VINs from the National Insurance Crime Bureau and use these numbers to confirm the identity and authenticity of public VINs in confidential (secondary) inspections. These VIN positions are also assigned responsibility to conduct preliminary investigations of suspected stolen vehicles for follow-up by appropriate persons.

### **Typical Work**

Maintains control of prenumbered VIN plates assigned and imprints state logo on VIN plates as needed; maintains local files on all inspections as required;

Examines assembled vehicles, glider kits, homemade motor vehicles rebuilt/salvage vehicles, homemade trailers with an empty scale weight of 3,000 pounds or more, and affixes prenumbered VIN plates;

Ensures compliance with the laws, regulations, and administrative codes enforced;

Provides technical assistance to inspectors in the field by researching origination of vehicles and locations of confidential VINs;

Plans, coordinates, and conducts in-service training to VIN inspectors; provides updated training materials as information becomes available on changes related to vehicle identification numbers and locations;

Conducts preliminary investigation in cases of suspected stolen vehicles; interviews and takes statements from involved persons, maintains appropriate records, assembles presentations and testifies in court proceedings, as required;





Makes appointments for dealer inspections; assists the public with accident reports and vehicle title and licensing;

Orders, maintains, and issues supplies; orders gasoline for Patrol facilities and is responsible for maintenance of the gasoline pumps and other equipment used at the pumps;

Conducts and maintains inventory on all nonexpendable items, maintains records of lost and found articles, and destroys obsolete records as required by policy;

Participates in training law enforcement support specialists, VIN Inspectors, and/or clerical, administrative, or office personnel in the district;

May perform all duties of a VIN Inspector;

May act as lead worker for VIN Inspectors, clerical, administrative, office, or district maintenance personnel;

Performs other work as required.

### **Knowledge and Abilities**

Knowledge of: federal and state laws regarding vehicle titling and registration; legal process and rules of evidence; interview techniques; court preparation and presentation; basic administrative and office procedures; office machinery; agency policies, procedures, and regulations.

Ability to: visually inspect vehicles thoroughly and read the VIN plates; bend, stand, squat, kneel and twist; write clearly; work around high noise levels and exhaust fumes; enforce VIN and vehicle licensing rules, regulations, and statutes; conduct interviews and take statements; obtain vehicle information from data communications systems; plan and conduct the operations of an office; provide direction for VIN, clerical, administrative, or office staff, interact effectively with co-workers and the public.

### **Legal Requirement(s)**

There may be instances where individual positions must have additional licenses or certification. It is the employer's responsibility to ensure the appropriate licenses/certifications are obtained for each position.





## Desirable Qualifications

Three years' experience as a peace officer, with at least one year of experience in VIN inspections or auto theft.

OR

Three years' experience as a Vehicle Identification Number Inspector.

Note: A valid driver's license is required.

Class Specification History

New class: 10-10-97

New class code: (formerly 41742) effective July 1, 2007

Title change (formerly Vehicle Identification Number Officer 2); adopted May 14, 2009, effective May 15, 2009.

<https://ofm.wa.gov/state-human-resources/compensation-job-classes/ClassifiedJobListing/Specifications/1156>



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Ste 140-723  
Olympia, WA 98502



### APPENDIX 3 – 2018 EMAIL FROM LT ASHLEY

**From:** Ashley, Jason (WSP) <Jason.Ashley@wsp.wa.gov>  
**Sent:** Thursday, August 16, 2018 10:25 AM  
**To:** Cobb, Stacy (WSP) <Stacy.Cobb@wsp.wa.gov>; Dorich, Douglas (WSP) <Douglas.Dorich@wsp.wa.gov>; Esquivel, Suzanne (WSP) <Suzanne.Esquivel@wsp.wa.gov>; Forrester, Kevin (WSP) <Kevin.Forrester@wsp.wa.gov>; Gyer, Norman (WSP) <Norman.Gyer@wsp.wa.gov>; Helpenstell, Dick (WSP) <Dick.Helpenstell@patrol.lcl>; LaMarca, Donna (WSP) <Donna.LaMarca@wsp.wa.gov>; Likes, Curtis (WSP) <Curtis.Likes@wsp.wa.gov>; McCallum, Terry (WSP) <Terry.McCallum@patrol.lcl>; McMillen, Denise (WSP) <Denise.McMillen@wsp.wa.gov>; Noack, Robert (WSP) <Robert.Noack@wsp.wa.gov>; Osmonovich, Brad (WSP) <Brad.Osmonovich@wsp.wa.gov>; Potts, Ronald (WSP) <Ronald.Potts@patrol.lcl>; Schmidt, Blair (WSP) <Blair.Schmidt2@patrol.lcl>; Tufts, Bill (WSP) <Bill.Tufts2@wsp.wa.gov>; Vibar, Helen (WSP) <Helen.Vibar@wsp.wa.gov>; Viera, Miguel (WSP) <Miguel.Viera@patrol.lcl>; Wiles, Melissa (WSP) <Melissa.Wiles@wsp.wa.gov>  
**Cc:** Richmond, Daniel (WSP) <Daniel.Richmond@wsp.wa.gov>; Hullinger, Randy (WSP) <Randy.Hullinger@patrol.lcl>; Cabezuela, Jay (WSP) <Jay.Cabezuela@patrol.lcl>

**Subject:** Workload Increase

All,

I wanted to take a moment to share some information related to the VIN program and confirm some of the feeling you have all expressed regarding an increased workload and a noticeable increase in no-shows in the last year. Data only tells a part of the story but what this data expresses is we have reached maximum capacity with our available staff and the increases we are experiencing in requests for inspections can only have a deleterious effect on wait times. I am meeting with the Deputy Director of DOL today to discuss the future of the program, the current trends, and funding we receive from DOL for this service. As you all are aware we receive \$15 for every inspection that is generated. If we use 2017 as an example  $31,065 * 15 = \$465,975$ . It costs \$1.45 million just to run the VIN program a year. We are not receiving adequate funding for a 100% DOL benefitted program. I am, with the support of our senior executive leadership, working on a sustainable and reasonable solution which will alleviate this issue. I had the pleasure of briefing the Chief and executive staff yesterday at SAF on this very issue and received their blessing to solve this issue. Chief Batiste conveyed his sincere appreciation for your diligent and continued work.

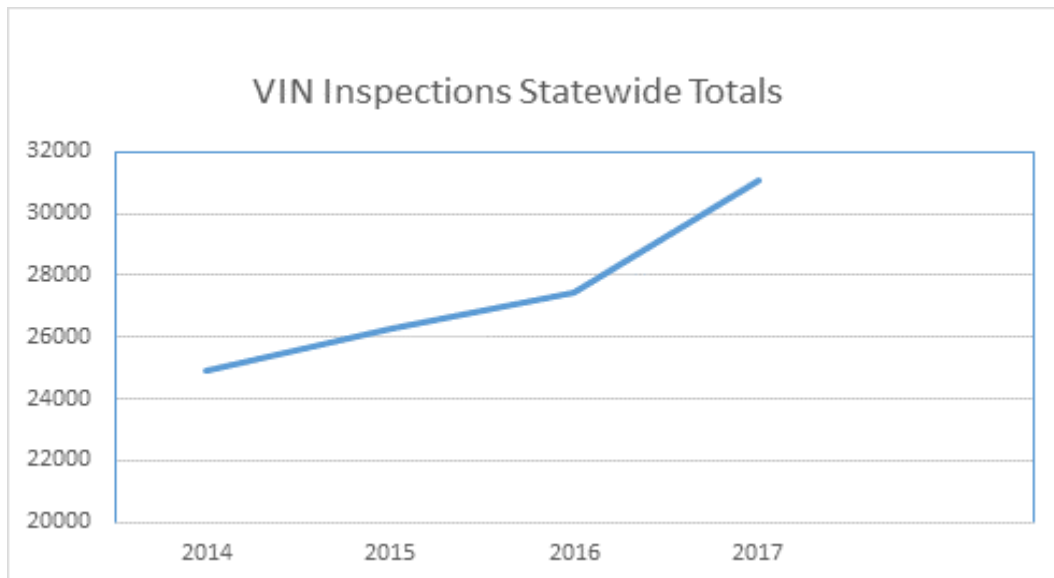
Since 2014 there has been an increase of 6161 inspections with no new officers and varying vacancies throughout that period. There is a formula based upon the average where a VIN officer can successfully conduct 2100 inspections per year. That is a minimum of 3 additional inspectors needed to handle the work load increase since 2014. If the trend continues this year we will see an additional 4K inspections meaning that in the last 5 years we have seen a 10K increase. Even with all the technology, process improvements, and hard work are experiencing an oversaturation of the schedule and increased wait times are continuing to

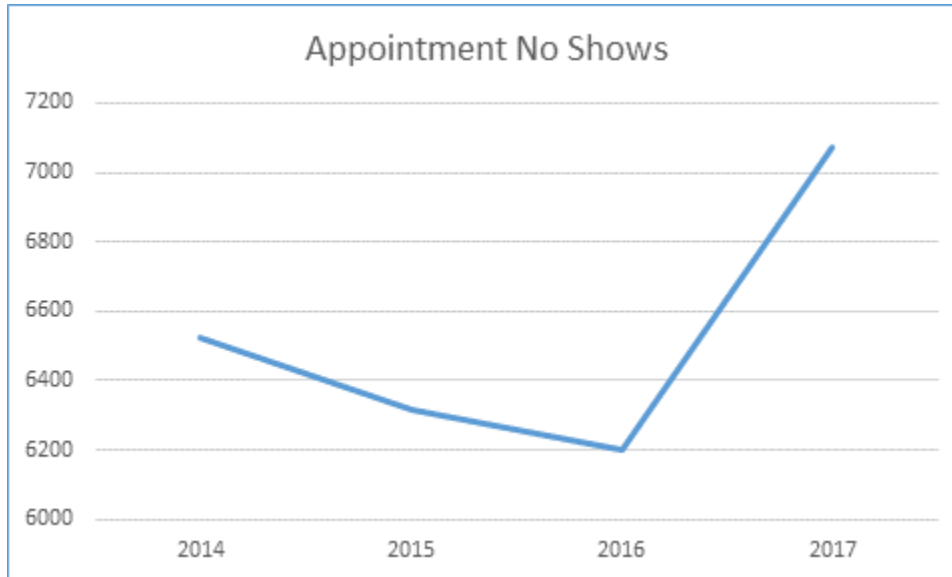


1001 Cooper Point Rd SW  
Ste 140-723  
Olympia, WA 98502

grow. Please take a few minutes (I know you don't have many) and review the information below and become familiar with it.

Count of Status	Column Labels								Grand Total
	1	2	3	4	5	6	7	8	
Row Labels	1	2	3	4	5	6	7	8	Grand Total
<b>2014</b>	5423	4035	3764	3307	2632	1368	2998	1377	<b>24904</b>
<b>2015</b>	5286	4488	3503	3103	3130	1315	4169	1283	<b>26277</b>
<b>2016</b>	4625	5581	3364	3520	3104	1175	4847	1228	<b>27444</b>
<b>2017</b>	6506	6693	3728	3747	3198	1129	4782	1282	<b>31065</b>
<b>2018 (YTD) 7/1/18</b>	4152	4133	3361	2195	2232	639	2914	856	<b>20482</b>
<b>Grand Total</b>	<b>25992</b>	<b>24930</b>	<b>17720</b>	<b>15872</b>	<b>14296</b>	<b>5626</b>	<b>19710</b>	<b>6026</b>	<b>130172</b>





The current monthly average is 2900 inspections statewide. IF this trend continues we will see inspection totals at the end of the year in the neighborhood of 35k. All of the preceding data is obtained by querying the completed SOFs / CVIs in the system. One thing I need you all to be aware of is the value of the program is 100% a DOL benefit. Of the 31065 vehicles inspected we recovered only 75 stolen vehicles/parts. That is 0.2% of the total inspections. While every stolen vehicle recovered is important this data proves even more that the inspection is really benefiting the licensing agency not the auto theft statistics and that 99.8% of the vehicles you inspect are righteous vehicles and pass inspection.

I want you each to know how much I appreciate you. You work hard for me and the agency, you are greatly appreciated and cared for. We are working hard to grease the wheels of progress and impress upon our funding bodies the importance of you, your job, and the challenges you are up against. I ask of each of you to continue to review your processes, your work and find any ways to increase efficiency but also be realistic and take time off when you need it. Rest is important and vacations and time off allows you to be engaged with your families and recharge your batteries. Thank you for being you, for continuing to work under challenging circumstances, and for serving the citizens of this state with integrity, humility, and respect.

Feel free to call me if you have any questions, concerns, or comments. I am available to you 24 / 7

Jas

*Lieutenant Jason L. Ashley*



Washington State Patrol  
Criminal Investigation Division  
O-(360) 704-2954  
C-(360) 515-8490

## APPENDIX 4 – VIN INSPECTION PROCESSES

VIN Officers work four 10-hour days a week. Their two 15-minute breaks and one 30-minute lunch break are unpaid time, so if they take the breaks and lunch time the workday spans 11 hours. Some locations such as SeaTac also work an additional two Fridays a month as “Dealer Days”, to dedicate specific time for dealership inspections. A team of 2-3 VIN Officers may complete between 80 and 100+ inspections during a Dealer Day, as dealers typically have complete and proper paperwork available for the inspections.

Most VIN inspections take 30 minutes. Some inspections may take an hour, especially when there are issues with the repairs or the invoices for parts, and particularly when stolen parts are found.

The in-person observations occurred in four different types of facilities:

**SeaTac** – a stand-alone District 2 VIN Lane building with no running water or restroom. Facilities are available in the WSP detachment office across the parking lot from the VIN Lane.

**Chehalis** – a WSP District 5 detachment office with no VIN Lane, garage, carport, or shelter of any kind. All inspections are conducted in the parking lot, regardless of the weather. Tools must be carried to and from the office after every inspection. As an outlying facility the VIN officer is often alone for hours.

**Vancouver** – a stand-alone District 5 VIN Lane building with office space and restroom facilities, a separate garage with a lift, located on the grounds of the local DOL office. This is the only facility which is not WSP property. The nearest WSP office is approximately 2.5 miles away.

**Tacoma** – a stand-alone District 1 VIN Lane building with a lobby for the public, office space, and restroom facilities located on the grounds of the WSP District 1 office.

The process is almost identical across these facilities:

### VIN Officers

- Review their appointments for the day
- Check for phone messages from the night before and respond to the callers as needed
- Read email from the night before and respond to the senders as needed
- Prior to each appointment use information captured in the appointment request to research the vehicle to be inspected. The VIN officer will search for the VIN in the National Motor Vehicle Title Information System (NMVTIS) database to check ownership and whether the vehicle is reported stolen.
- Research is dependent on the type of inspection scheduled. For a salvaged/rebuilt vehicle the Officer searches for the vehicle in the salvage yard databases: Copart or IAAI. The salvage yards document information about each salvaged vehicle including photographs of the damage. This helps the VIN officer know exactly which portions of the incoming vehicle to inspect and what invoices for parts should be presented for the repairs.



- When the driver arrives for the appointment, the VIN officer meets the car and driver in the lane/driveway/parking lot and requests identification and the required paperwork for the vehicle inspection.
- If all the required paperwork is present and there are no irregularities during the physical examination of the vehicle the VIN officer completes the Statement of Fact in CITE, prints, stamps, and signs the form, and gives it to the driver.
- If all the required paperwork is not available, the driver is notified that the Statement of Fact will not be provided. In most cases the VIN officer completes the physical inspection. If no irregularities are found in the physical inspection the VIN officer provides the information on what is required to complete the inspection and obtain the Statement of Fact. The driver is told that a scheduled appointment will not be needed, just return with the required paperwork.
- If there are irregularities during the physical examination the VIN officer will research further to confirm whether invoices for parts have been altered or fabricated, whether invoices are missing for Major Component Parts, etc. The driver will be instructed what to do to remedy the issues to obtain the Statement of Fact.
- If the physical examination reveals indication that the vehicle or parts of the vehicle are suspicious the VIN officer will research further to determine whether the vehicle or parts of the vehicle are stolen goods. If so, the Auto Theft Team or case officers will be contacted, and they may impound the vehicle and open a new (or update an ongoing) investigation.

There are different process steps for other types of appointments but Salvage/Rebuild are the most common VIN inspection.

## VIN INSPECTIONS

### ➤ VIN Inspection Types- General Breakdown

#### **WSP VIN inspections required by RCW 46.12.560**

WSP VIN and DOL worked together to provide the citizens with general types of inspection for DOL to direct the customer for setting appointments. These identify the most common reasons for inspection and further identify the amount of time WSP has set aside for those specific inspections to accommodate scheduling.

WSP has identified 30 minutes or one hour as time needed to complete specific types of inspection in general, these are just a rule of thumb, assuming the best case scenario. They do not take into consideration the many issues that may arise during any type of inspection. On occasion, the inspection will be completed in slightly less time, however, very often, it will take more time. Any less time is used to make up for those which take longer or for other various duties, i.e. return phone calls.

**NOTE:** A few VIN lanes allocate additional time for specific inspections, i.e.: trailers, an hour instead of 30 minutes. We took into consideration overall conditions and available personnel.



Typically, more time is due to the specific VIN lane having only one VIN Officer working at any given time, as well as the specific facility where they work. Some areas have well-defined, well equipped and enclosed climate controlled lanes, others work outside in the elements, often in less hospitable working environments, whether rain, snow, excessive heat and cold, and many in dirt, gravel or asphalt parking lots.

A VIN officer may block additional time on the schedule when made aware of other specific issues.

➤ **VIN Inspections Types, Descriptions**

Many may expect that VIN inspections are a simple one, two, three and done process and shouldn't take more than a few minutes. That couldn't be more wrong. There are many complexities involved in VIN inspections which can quickly change what is needed to be done in an inspection.

Every make, year, model and type of vehicle present different challenges for every type of inspection we do. Manufacturers change how and where they apply secondary VINs depending upon the year and the plant which make them unique.

Most of the time there are varying levels of challenges to access those VINs. Inspections are often like trying to fit a square peg into a round hole. It is not simple to define that 30 or 60 minutes is necessary to complete an inspection as there are many varying factors for each type of inspection

**Available options for a VIN inspection appointments:**

<https://www.wsp.wa.gov/driver/schedule-a-vin/>

Insurance or wrecker destroyed, salvaged vehicle	0:30
Ownership in doubt	0:30
VIN Verification	0:30
VIN does not conform (Not 17 digits)	1:00
No VIN (Homemade or Unidentifiable)	1:00
DOL Code 6500	1:00
DOL Code 7700	1:00
Assembled, Street Rod, Custom or Kit Vehicles	1:00
Trailers	0:30
Non-Resident Student or Military only	0:30
Other (Please call ahead)	1:00
Lost Title	0:30
License Cancelled	0:30



➤ **All inspections:  
Standard Procedures, Basic Steps:**

**Basic physical inspection:**

Contact the presenter, obtain all documents related to the vehicle to be inspected and driver's license. Obtain any additional data from the presenter related to the specific type of inspection.

Visually examine the FMVSS for the VIN and its authenticity. Scan the bar or QR code on it if there are any present, verify if it matches the printed VIN on that label.

Utilize the OBD II to check for the VIN as saved in the vehicle's computer

Verify the mileage is in line with the sale, odometer disclosure or other documents. If none listed, document the current mileage shown on the odometer.

Verify the VIN on the dash (or other primary public VIN location depending on the vintage and manufacturer of the vehicle)

Engine compartments will be checked for other identifiers, emissions data, engine, transmission and any other significant numbers possible with time available

Compare VINs located to any documents presented for correctness and that they agree, verify the FMVSS label, the VIN plate, how they are attached, and the VIN itself is authentic, unaltered, undamaged, not missing, fictitious or switched with another.

A minimum of two points of identity are required in order to pass any VIN inspection.

Check for and verify as many secondary VINs as can be located with time available on the vehicle and for any MCPs on it. This includes confidential VIN locations when possible or required for some inspection types. Any discrepancies require further examination.

Some specific types of inspections require more in depth examination. Depending on any issues arising during any type of inspection, they may result in the initial inspection requiring a more in depth inspection. This will necessitate verification of additional points of identity which will expand the time needed for any type of inspection. I.e. A salvage inspection becomes an assembled inspection due to discovery that the cab or frame was changed.

Inspections often require locating confidential and/or frame or other secondary VINs... Verification is often difficult due to and accessibility, age, wear and tear, rust, poor stamping, or someone has purposely altered, ground, removed, replaced with fictitious VINs, or the many other ways of disguising or obliterating them.

Visually verify that all MCPS are attached.



All MCPS are required to be on the vehicle unless exempted by RCW or WAC, meet FMVSS and all requirements in law and will not pass inspection for licensing if any MCPS not exempted are missing.

➤ **Standard Procedures, Basic Steps**

**Processing Paperwork for Inspection Document  
Basic Steps for All Inspection types**

All documents presented related to the vehicle and any major component parts (MCPS) are examined for authenticity and to determine they meet all requirements.

VIN Officers often need to re-contact the presenter for clarification of documents, or additional information needed to complete the inspection.

Per RCW 46.12.560, documents must be examined to verify they comply with RCW 46.80. Any documents presented for a vehicle or MCPS that do not list the description of the vehicle or MCP, the VIN or stock number, or if any doubt of the provenance for any MCP will necessitate the VIN officer to contact the vendor for the data and verification. i.e.; a fender which does not have a description of the part and only a stock number, requires verification from the vendor and may be done by phone call.

VINS located on the vehicle, VINs listed for vehicles and MCPS on documents presented are checked for stolen as well as other issues, i.e. non-repairable/Junk, duplicate or cloned VINs, and various other issues in multiple data bases.

CITE is the computer program that VIN officers use to complete inspections. CITE is to be checked for any previous entries by that VIN which may indicate that a VIN inspection is being held for whatever purpose or that the vehicle was previously presented for inspection and discovered to have non-repairable type status.

Data bases checked for inspections include: NCIC, WACIC, NICB, ISO, NMVTIS, Washington DOL and other states licensing data bases as indicated, and include IAAI, Copart and other insurance auctions data bases.

Any and all VIN plates assigned to the vehicle will have the VIN and the control number documented in the proper tabs in CITE and in the VIN audit system for tracking. The comments in the SOF will reflect the VIN, control number and the location that specific VIN plate was affixed to, and whether or not it was riveted.

If the vehicle has a cab/body and a frame from a different vehicle or a new frame, a Washington VIN plate indicating the public VIN will be assigned to the frame and the WA logo will be stamped near the VIN plate and the original frame VIN.





In the event the public VIN is missing or not viable, i.e. The public VIN is from a nonrepairable type vehicle which renders that VIN not usable, a prenumbered VIN plate will be assigned to the cab/body and a repeat of that VIN on an unnumbered plate will be assigned to the frame following the same procedure as for a public VIN.

It will be documented in the comments for any VIN identifiers that have already been or that WSP has removed.

Vehicles that no longer bear the original Public VINs, are missing, or that are being assigned or re-assigned will have a VIN relocate decal affixed onto the dash area to indicate: This vehicle has been inspected and the VIN relocated by the Washington State Patrol. The replaced public VIN plates will usually be affixed to the driver left door striker post, in some cases the driver door hinge post or same area on the passenger side depending on where the public VIN for that vehicle would normally be placed by the manufacturer.

If a confidential VIN was placed onto the vehicle, the C-VIN data will not be noted in the copy of the SOF provided to the presenter, but will be added to the Log and/or the comments after the SOF was provided to the presenter.

Once all these checks are completed, data accrued and verified, and there are no additional issues discovered, the VIN officer will complete a Statement of Fact (SOF) noting the pertinent details from the inspection.

The SOF will be checked for accuracy and completeness, then will be printed, signed and the inspection stamp imprinted on the SOF and all the documents presented to the inspector for the vehicle and MCPS.

- Note: The 30 minute or one hour inspection times are based on a relatively routine inspection, a minimum of MCPS replaced or utilized for the type of inspection, and documents are straightforward with no additional issues.

➤ **Issues which may impact the initial inspection**

Some inspections will net a larger number of documents for MCPS, or one or more parts vehicle(s) will be used for the vehicle being inspected. Large numbers of receipts/invoices require extra time.

Parts vehicles and/or Parts Only vehicles are each required to be entered in CITE, documenting which MCPS were used from that vehicle and on which vehicles. Documents will be notated with which MCPS were used, and stamped. This prevents parties from using the same documents for the same parts on other vehicles.





Parts only type vehicles are never be repaired, licensed or titled again, and are to be used as a source for parts or scrap only. When presented for inspection, they are entered in CITE after a cursory inspection to warn other VIN officers of their status.

Some inspections go smoothly, many do not. Often other issues are found resulting in extra time needed for that inspection or changing the type of inspection needed.

Some inspections will be incorrectly selected for appointments requiring additional time.

Some inspections will reveal other issues changing the status and type of inspection. They may result in stolen vehicles or MCPS; missing, altered, obliterated VINs or other similar issues requiring additional time or even confiscation of the vehicle in order to be identified.

Some inspections may unexpectedly end up requiring VIN plate(s) to be assigned to the vehicle which require further steps and time for both the physical and documentation inspection.

### **Incomplete vehicles, Incomplete Inspections**

All MCPS are required to be on the vehicle unless exempted by RCW or WAC, meet FMVSS and all requirements in law and will not pass inspection for licensing if any MCPS not exempted are missing.

A person presenting a vehicle for inspection who is unable to provide an acceptable release of interest or proof of ownership for a vehicle, or for MCPS, will be given the option to do so. The VIN officer will take the time to explain their options.

VIN officers must note in the comments of the VIN inspection if a vehicle is incomplete, and if so, which MCPs are missing.

An incomplete vehicle cannot be licensed for the road as they do not meet FMVSS. If there are missing MCPS on a vehicle rendering it incomplete, on occasion, DOL may choose to start the process as a non-roadworthy vehicle for ownership in doubt, any missing or unacceptable MCPS will be noted in the SOF if provided. However, approved provenance will be required for any MCPS added later, and DOL may choose to start the ownership in doubt process over if none are provided. If so, DOL will require an additional inspection to verify any MCP(S) have been installed on the vehicle and whether or not the required ownership documentation of the MCP(S) is provided.

Note any required documents for the vehicle and/or the MCPS are not provided, and that the vehicle is subject to RCW 46.12.680 for ownership in doubt.

If a person presenting a vehicle for inspection is unable to provide an acceptable release of interest or proof of ownership for a vehicle, or for MCPS, shall apply for an ownership in doubt as described in RCW 46.12.680.





If any MCPS are required but missing, or which are required to be repaired or replaced and have not been, the presenter will be given an opportunity to do so.

In the case of missing or damaged MCP(S), the SOF will be withheld until the presenter can obtain the required MCP(S) and return for WSP to verify their provenance and that they are installed on the vehicle and meet requirements by law.

For expediency and as a courtesy in both cases, VIN Officers will complete as much of the SOF as possible. In most cases, an additional appointment will not be required.

The SOF will be withheld until the presenter can obtain proper documents for the required vehicle and/or MCP(S). If it is determined they cannot, the SOF will be completed with the requirement to apply for ownership in doubt. Damaged or missing MCPS will require the vehicle to return for WSP to verify missing or damaged MCPs are installed on the vehicle and meet the law as well as any required documentation prior to the SOF being provided.

If an SRS light is not operational, the vehicle will not pass until it is, and will have to return to be verified operational. The SOF will be completed and noted in the comments that the SRS is not operational, the SOF will be withheld until corrected.

- **Additional steps for inspections for both physical and documentation are listed under their specific category below**
- **Insurance or wrecker destroyed – Salvage Inspections: 30 minutes**

Obtain any additional data from the presenter including where the damage was, repairs made, what major component parts (MCPS) were replaced to repair the vehicle, and a quick review of the documentation they are providing. Salvage vehicles are required to have all MCP(S) on the vehicle and to meet requirements in law.

Securely attach a marking at the driver's door latch pillar indicating the vehicle was previously destroyed or declared a total loss. \* It is a class C felony for a person to remove the marking indicating that the vehicle was previously destroyed or declared a total loss. RCW 46.12.560

Visually verify the airbag light is functional indicating the SRS (Supplemental Restraint System – airbags) is operational.

If an SRS light is not functional, the vehicle will not pass until it is, and will have to be brought back to be verified. Even if an airbag did not deploy, often the computer needs to be reset for the SRS to be operational. The SOF will be withheld until the SRS is verified as operational.







Visually verify that all repairs have been made to meet the requirements in law and that all MCPS are attached.

Vehicles purchased from insurance auctions like Copart or IAAI will be checked for photos showing damage, missing MCPS or MCPS that were with but not attached to the vehicle when sold at auction to determine which MCPs would have been required to be repaired or replaced including deployed airbags.

Re-contact with the presenter is often needed to determine what was done to repair or replace MCP(S) that show damage requiring them to be repaired or replaced that they did not disclose upon initial contact and/or there are no documents provided for those MCPS.

➤ **VIN Verification: 30 minutes**

Note any information on the WA DOL Request for Inspection for any notes relating why it is needed or that the presenter articulates

Any discrepancies from paperwork or records to the VINs located on the vehicle require further examination

VIN officers will indicate specific VIN discrepancies in the comments and will indicate that WSP has verified the VIN, what that VIN is, and that is TRUE and correct for that vehicle

Some discrepancies will require further action, possibly to provide VIN plates and/or stamping with either a new or a verified VIN to be reassigned

Often a VIN verification will escalate into a different type of inspection to be followed and additional time will be required. i.e. Missing VINs, Stolen vehicle once VIN is identified and verified

➤ **VIN does not conform (not 17 digits): 1 hour**

Check for and verify as many secondary VINs as can be located with time available on the vehicle and for any MCPs on it. This includes as many confidential VIN location(s) as possible. This examination is somewhat driven by various specific circumstances.

Sometimes it is simply a matter of a digit has inadvertently been left off or added and there are less than or more than 17 characters in the record, or it is just incorrectly documented. I.e. an "S" is incorrectly noted as a "5"

Vehicles older than 1981 do not have 17 digit VINs. Vehicles manufactured for other countries, older or modern, may not have 17 digit VINs. VIN structures for these vehicles vary and may be difficult or take more time to determine the structure, location and verify.





Other times, the VIN on a vehicle has purposely been in some way altered, removed or obliterated.

Any discrepancies that do not resolve simply or due to documentation errors, require further examination

VIN officers will indicate any discrepancies in the comments and will indicate that WSP has verified TRUE and correct VIN for that vehicle.

Any measures taken to correct or identify the VIN on the vehicle itself will be documented, including if the VIN on a vehicle has been in some way altered, removed or obliterated. These issues may change the type of inspection and additional steps needed to be taken.

Often any of those noted issues above that come to light will require one or more VIN plate(s) to be attached to a vehicle to document its TRUE identity depending on the outcome of the inspection.

➤ **No VIN (Homemade or Unidentifiable): 1 hour**

**Per RCW 46.12.560 (5) (VI) – identification number is otherwise absent, (c) WSP shall assign an identification number (d) assigned by the Washington state patrol as the official vehicle identification number assigned to the vehicle**

**Per WAC 308-56A-455:**

A homemade vehicle is one that has been constructed from any combination of new, used, or homemade parts that does not resemble a vehicle that was manufactured under a specific year, make, and model by a manufacturer. This includes:

- (a) A vehicle that has been structurally modified so that it does not have the same appearance as a similar vehicle from the same manufacturer;
- (b) A vehicle that has been constructed entirely from homemade parts and materials not obtained from other vehicles; or
- (c) A vehicle that has been constructed by using major component parts from one or more manufactured vehicles and cannot be identified as a specific make and model.

Obtain any additional data from the presenter related to the vehicle being homemade to clarify what was done to construct the vehicle to know how to proceed with the physical and ultimately the inspection of documents provided, or to determine that the vehicle is not homemade but is missing its identifiers

Completing a thorough visual examination of all MCPS and any identifiers including any confidential identifiers is essential and will further drive the prescribed process for the inspection

Unidentified or homemade vehicles often will require one or more VIN plate(s) to be attached to a vehicle to document its identity depending on the outcome of the inspection. A vehicle with no



VIN will require the same VIN to be assigned to both the body and to the frame. A repeat of the VIN or a partial VIN may also be stamped into the frame.

➤ **DOL Code 6500: 1 hour**

Vehicle has a stolen vehicle indicator

- Often if a VIN officer sees a 6500 flag noted on an upcoming inspection, they will do a bit of research themselves or contact the VIN Help Desk in advance for assistance, guidance and preparation.

The presenter may or may not be a suspect, thus the flag. Obtain any additional data from the presenter related to the inspection and how he obtained the vehicle and anything specific that he has done or he is aware of that someone else has done to the vehicle

All possible secondary and confidential VINs will be verified and closely scrutinized for missing, altered, fictitious or fraudulent VINs or if another VIN plate or label from another vehicle has been affixed onto it.

- If the VIN on the vehicle is verified and returns as stolen, all documentation has to be gathered, verified as a current outstanding or as an unrecovered and purged stolen vehicle.

Stolen reports must be obtained for verification the vehicle is a match, any additional and any discrepancies and various data bases checked to verify ownership and to identify any suspect data.

Appropriate notification to a supervisor must be made. A commissioned law enforcement officer will recover the vehicle, and handle any further investigation necessary.

On occasion a vehicle was stolen and has already been recovered, however the DOL and possibly other records indicate a stolen or possible stolen. If the vehicle is verified to have been recovered and the DOL record still has the stolen flag on the record, gather the data and forward to the VIN Help Desk who will work with DOL remove the flag.

Although the vehicle may turn out to have been a stolen vehicle and recovered, the VIN may have purposely been in some way altered, removed or obliterated. It may require one or more VIN plates to be assigned.

In some cases, the VINs may have been ground off, stamped over, or otherwise obliterated and require chemical processing to restore the VINs in order to fully verify the identity of the vehicle.





In most cases due to the time required to complete the chemical process, the vehicle will be retained by the VIN Officer. That process is usually lengthy and cannot be done during the allotted inspection time.

RCW 46.12.725 allows the vehicle to be impounded and held by the seizing law enforcement agency for the purpose of conducting an investigation to determine the identity of the article or articles, and to determine whether it had been reported stolen.

Stolen vehicles often will require one or more VIN plate(s) once the TRUE VIN has been established to be attached to a vehicle to document its identity depending on the outcome of the inspection and/or follow up investigation.

VIN officers will follow the established protocol for VIN plates to be assigned.

WSP will indicate the originating agency, case number, date of theft (DOT) on the stolen record as well as the recovering agency, case number, date of recovery and badge number (if available) in the comments in CITE

Any other pertinent information such as who the vehicle was released to or the tow company, etc. will be added to the comments.

➤ **DOL Code 7700**      **1 hour**

The vehicle is a suspected or known clone. This indicates a vehicle has a duplicate VIN with another vehicle titled and/or licensed under the same VIN.

- Often if a VIN officer sees a 7700 flag noted on an upcoming inspection, they will contact the VIN Help Desk in advance for assistance, guidance and preparation.

The presenter may or may not be a suspect, thus the flag. Obtain any additional relative data from the presenter

Cloned VINs are a VIN issued to another vehicle by the manufacturer that has been captured and utilized on a stolen vehicle in order to hide its identity, TRUE VIN and stolen status. The original VINs on the clone vehicle may be covered or removed with a false plate or label over or replacing them.

The vehicle being presented may be the original or the vehicle bearing the cloned VIN and must be thoroughly examined for all possible VINs and other identifiers to determine and document which one it is.

Cloned VINs will be found on fraudulent dash VIN plates, FMVSS and other identifiers are often very difficult to discern, bar and QR codes are programmed to match the cloned or fictitious VINs as well as the OBD is often reprogrammed to reflect the cloned VIN





All identifiers, mileage, color of the vehicle, both original and/or repainted, titles and other sale documents are crucial to identify both vehicles (sometimes the VIN is duplicated/cloned onto more than one vehicle) and in an effort to identify possible suspects.

Cloned vehicles are another which may have had VINS ground off necessitating chemical processing on those which bear the cloned identifiers to fully identify the vehicle.

In most cases that will require the vehicle to be retained by the VIN Officer. That process can often be lengthy and cannot be done during the allotted inspection time.

RCW 46.12.725 allows the vehicle to be impounded and held by the seizing law enforcement agency for the purpose of conducting an investigation to determine the identity of the article or articles, and to determine whether it had been reported stolen.

Cloned and/or stolen vehicles often will require one or more VIN plate(s) to be attached to a vehicle to document its identity depending on the outcome of the inspection and/or follow up investigation.

Once a vehicle is confirmed as being either the cloned victim or the cloned and stolen vehicle, further documentation is required to resolve the various ensuing issues created by the cloning for both vehicles. Cloned VINs may have both vehicles in the same state or may be in different states, or even a different country. Most often the cloning of vehicles originates in another state or Canada and were imported into the US rather than Washington, however we recently have had some originating in Washington.

The VIN officer must notify a supervisor of the clone issue and advise if it is the cloned and stolen vehicle, or if it is the original/victim vehicle.

If the vehicle appears to be stolen, the same process as the 6500 above needs to be followed.

In order to resolve the cloned VIN issues, other agencies/states will require proof of the identity of the vehicle inspected.

Complete data is necessary to be gathered to include for both vehicles regardless if it is the victim with TRUE VIN or the vehicle with the displayed/cloned VINS.

- Cloned vehicles have additional issues and processes. Notify the VIN Help Desk, gather provide and all the data you have already received to include the following:

Returns from NCIC/WACIC/NICB/ISO/NMVTIS, and Carfax if available. Any documents presented for provenance for vehicles and MCPS.

All returns for any state(s) with a record

PHOTOS to include front, rear and both sides of exterior, general interior, all good and bad VINs, obliterated, removed, counterfeit, cloned VINs, any TRUE VINs and other identifiers located to include before, during, and after examination and with any new VIN affixed at completion.





Odometer, OBD, Scanner readouts, anything that looks suspicious or important to assist identification.

A good vehicle description, to include anything particular about the vehicle related to the VINs, what is and isn't there, that was checked or was unable to be checked, etc.

Include any data received for MCPS with VINS located- both counterfeit and TRUE VINs, anything unusual that might help identify the other vehicle, an investigation or inspection down the line.

The VIN Help Desk will utilize any data received and gather any additional data needed and work with law enforcement and/or the licensing entity for the affected state(s) and any identification requirements and resulting title issues.

The other vehicle will be required to be inspected by appropriate law enforcement to verify its identity.

Removal of the title from NMVTIS and any state bearing records for a vehicle using the VIN cloned from another vehicle is necessary prior to a vehicle bearing the TRUE VIN to be titled and/or licensed.

The process often takes months to locate the other vehicle, arrange for inspection and resolve the titling issues. The vehicle with the TRUE VIN cannot be retitled or relicensed until the records are corrected.

➤ **Assembled, Street Rod, Custom or Kit Vehicles: 1 hour  
WAC 308-56A-455 (1)**

An assembled vehicle is a vehicle that has been constructed using a cab, body, or frame from two or more vehicles and has the same appearance as a vehicle that was manufactured under a specific year, make, and model by a manufacturer but the original vehicle identification number (VIN) no longer accurately describes the vehicle.

Obtain any additional data from the presenter related to the inspection and clarify which of the MCPS were used and from which vehicles or invoices, especially important are the cab/body and frame,

WSP assigns the cab/body VIN to most assembled vehicles since November 1, 2018. All VINs are required to be checked via NMVTIS and other data bases to verify they are not from a non-repairable type vehicle rendering the VIN unusable, or being used to identify another vehicle.

The public VIN will be listed as the primary VIN in the SOF. The frame VIN will be listed as the secondary VIN in the engine/coach tab on the SOF.





A Washington VIN plate indicating the public VIN will be assigned to the frame and the WA logo will be stamped near the VIN plate and the original frame VIN. If the public VIN is not viable, a prenumbered VIN plate will be utilized for the public VIN and repeated on an unnumbered VIN plate on the frame using the same procedure.

VINs will also be documented in the comments of the SOF and indicated as to which was used as the identifier and the control number(s) will be added to their appropriate tabs and noted in the comments.

The SOF will note in the model field "Assembled" and note it in the comments. DOL will show ASM as part of the model field on their records.

➤ **KIT Vehicles: RCW 46.37.519**

- a) "Kit vehicle" means a passenger car or light truck assembled from a manufactured kit, and is either (i) a kit consisting of a prefabricated body and chassis used to construct a complete vehicle, or (ii) a kit consisting of a prefabricated body to be mounted on an existing vehicle chassis and drivetrain, commonly referred to as a donor vehicle

A KIT vehicle essentially follows much of the assembled process to verify VINs, documents, check data bases for stolen, etc.

A kit vehicle will be titled as a KITV, not as the make it was built to resemble.

KITV have specific requirements on equipment, those will be checked to verify they are present as per RCW **46.37.519**

Check for equipment on or not on the vehicle and document in the SOF

If a KITV comes with a VIN, it will generally be used unless the VIN Officer determines it not viable for any reason. An unnumbered VIN plate will be added to the frame VIN with a repeat of the KITV body VIN.

If unable to use the KITV VIN provided by a KIT manufacturer, or one was not provided, a WA prenumbered VIN will be assigned to the body and a repeat of that VIN on an unnumbered VIN Plate to the frame, and the frame VIN will be documented as a secondary identifier. In some cases if viable, the frame VIN may be used.

WSP describes the make, body and year of what the KIT replicates in the model section, i.e.  
1927 Ford Model A pickup

The year of the vehicle will be noted as the year on the Manufacturers Certificate or Statement of Origin (MCO/MSO) of when the KIT was built

Year: 2023 Make: KITV Model: 1927 Ford Model A pickup



➤ **Street Rods and Customs**

**Street rod vehicle. RCW 46.04.572**

"Street rod vehicle" means a motor vehicle that:

- (1) Is a **1948 or older vehicle** or the vehicle was **manufactured after 1948 to resemble a vehicle manufactured before 1949**; and
- (2) Has **alterations to one or more of the major component parts** listed in RCW 46.80.010 **that change the appearance or performance of the vehicle from the original** manufacturer's design or has a body constructed from nonoriginal materials.

**RCW 46.04.161 Custom vehicle.**

"Custom" vehicle means any motor vehicle that:

- (1) **Is at least thirty years old and of a model year after 1948** or was **manufactured to resemble a vehicle at least thirty years old and of a model year after 1948**; and
- (2) **Has alterations to one or more of the major component parts** listed in RCW 46.80.010 **that change the appearance or performance of the vehicle from the original** manufacturer's design **or has a body** constructed from nonoriginal materials.

The difference between Street Rods and Custom vehicles are the designation of the years- **Street Rods** are built **prior to 1949**, **Customs after 1948**, and both must be at least 30 years old or manufactured to resemble one at least 30 years old.

- The process is the same for both.
- Essentially both Street Rods and Custom Vehicles follow the same steps for an assembled or a homemade vehicle for inspections.

All the body and frame VINs and any MCPS must be verified and all the documents checked for proper provenance, stolen parts and vehicles

Depending on any available VINs on the vehicle WSP will assign either a body or a frame VIN or a new WA prenumbered VIN to both the body and the frame.

Check for equipment on or not on the vehicle and document in the SOF

**Street rods, Customs and KITV** may opt to not use hoods, fenders or bumpers per RCW 46.57.518 and RCW 46.37.500. That will be documented in the SOF.

VIN Officer will determine if the vehicle meets the RCW for the Street Rod or Custom and if it is an original vehicle modified or built from parts to resemble a specific make model and year.



If the **vehicle is an original manufactured vehicle that has been modified**, it will be identified as that make year and model, i.e. Year: 1927 Make: Ford Model: Model A pickup “Street Rod”; or Year: 1950 Make: Ford Model: F100 pickup “Custom”

Street Rod and Custom are used as designators, not a make.

If it was **not an original manufactured vehicle**, but **was built to look like one**, it will be identified as: Year: 2023 (the year completed), Make: Homemade, (what it replicates and which designator is appropriate) Model: 1950 Ford F100 “Custom”

➤ **Trailers: 30 minutes or 1 hour**

- Trailers will follow the same initial basic steps as in all vehicles whether the inspection is to identify it or as a homemade.

If this is a homemade trailer, check for any VINs present and if the documents indicate that a frame from another vehicle or trailer was used in the construction.

If a viable VIN is located and verified to match the trailer presented, in most cases it can be utilized, in the event of a homemade trailer, using a frame from another trailer or vehicle, a new WA prenumbered VIN plate is usually an assigned VIN.

If it is a manufactured trailer and only a partial VIN is located and the full VIN is able to be built, at minimum the, the full VIN will be stamped on the tongue of the trailer, most often an unnumbered VIN plate will be assigned with a repeat of that full VIN and the VIN will also be stamped and logo'd onto the tongue

In most cases of a homemade trailer, no viable VIN will be located. A WA prenumbered VIN plate will be assigned to the right side tongue of the trailer and a repeat of that VIN will also be stamped and logo' d into the tongue.

In some cases the WA VIN will be stamped in an undisclosed secondary location to be used as a confidential VIN for identification purposes.

A SOF with a full description and measurements to assist with the identity of the trailer will be completed

Ownership in doubt will be indicated if documentation does not support a title.

➤ **Non Resident Student or Military only: 30 minutes**

WSP is conducting a courtesy inspection for VIN verification for another state.







- The presenter must provide that state's inspection document to be completed by the VIN officer

VIN officer will compare all the documents for the ownership of the vehicle provided at the time of inspection to a minimum of two points of identity, additional if any concerns or the other state requires or requests it.

All VINs located will be checked in the usual data bases for stolen or other issues

WSP VIN officers will also document the inspection in CITE WSP completing the basic data and attach a scanned copy of the completed document for that state.

➤ **Other (Please call ahead): 1 hour**

Process will be determined by the data received from the requestor. All basic steps will be followed and any additional as determined by the circumstances.

➤ **Lost Title: 30 minutes**

Same basic process as ownership in doubt.

➤ **License Cancelled: 30 minutes**

WSP must determine the reason for the cancelled title to know which specific process and steps to follow. There can be many reasons a license was cancelled.

It could possibly be due to a duplicate VIN, a

Nonrepairable/Junk type title discovered by DOL causing cancelation of title and registration.

This may generate a different type of inspection required and be changed to a corresponding inspection and time required.



**APPENDIX 5 – QUESTIONS SUBMITTED TO ASCIA - SURVEY 2022**

1. Do you have a Vehicle Identification Number (VIN) inspection program?
2. If you don't, what entity (if any) in your state does VIN inspections?
3. What types of VIN inspections do you do (destroyed/salvaged vehicles, ownership in doubt, VIN verification, VIN does not conform to 17 digits, no VIN, assembled/custom/kit vehicles, lost title, license canceled, etc.)?
4. Who does the VIN inspections in your state (commissioned/non-commissioned)?
5. Where are the VIN inspections done?
6. What are the fees associated with VIN inspections?
7. How many VIN inspectors do you have?
8. How many VIN inspections do you do in an average year?

***ILLINOIS STATE POLICE:***

2. Q: *Do you have a Vehicle Identification Number (VIN) inspection program?*

A: The State of Illinois does not have a Vehicle Identification Number inspection program.

3. Q: *If you don't, what entity (if any) in your state does VIN inspections?*

A: Any sworn agency can VERIFY a VIN, however, per statute, 625 ILCS 5/4-107(1)(h) only Illinois State Police or Illinois Secretary of State Investigators may replace a VIN.

4. Q: *What types of VIN inspections do you do (destroyed/salvaged vehicles, ownership in doubt, VIN verification, VIN does not conform to 17 digits, no VIN, assembled/custom/kit vehicles, lost title, license canceled, etc.)?*

A: The Illinois State Police / Illinois Secretary of State Investigators may investigate a destroyed, altered, damaged, or no VIN on any motor vehicle as well as any sworn agency within Illinois.

5. Q: *Who does the VIN inspections in your state (commissioned/non-commissioned)?*

A: Any sworn agency within Illinois may complete a VIN inspection.

6. Q: *Where are the VIN inspections done?*

A: VIN inspections can be done at a civilian's residence, Secretary of State Office, any sworn agencies office, Illinois State Police Districts or any convenient and safe location for the Police.

7. Q: *What are the fees associated with VIN inspections?*

A: There are no fees associated with VIN inspections. The fee is automatically deducted from the yearly registration fees for license plates and titles.

8. Q: *How many VIN inspectors do you have?*

A: As for VIN inspectors, it would be the number of sworn personal in Illinois. If the VIN inspection yielded a more intensive inspection, the Illinois State Police Vehicle Investigation Officers or Secretary of State Investigators would open an investigation, this number would be less than 50.

9. Q: *How many VIN inspections do you do in an average year?*

A: On average, approximately 2000-2500 VIN inspections are completed by the ISP per year.

#### ***DELEWARE STATE POLICE:***

- *Do you have a Vehicle Identification Number (VIN) inspection program?*  
DSP Does have a VIN inspection program, within our Auto Theft Unit. It consists of 3 full-time employees and two part-time.
- *If you don't, what entity (if any) in your state does VIN inspections?*  
DE DMV also has an inspection program, but it is very limited. Any off site requests that come to them they send to our ATU.
- *What types of VIN inspections do you do (destroyed/salvaged vehicles, ownership in doubt, VIN verification, VIN does not conform to 17 digits, no VIN, assembled/custom/kit vehicles, lost title, license canceled, etc.)?*
  - Salvaged Vehicles that are considered a total loss by the insurance company. Some of the vehicles are retained and fixed by the owner, while others are sold at Auction to Wholesale Dealer's and anyone who obtains a Buyer number from the Insurance Auctions.
  - We are called upon to Identify Vehicle that are total burns that can't be identified by Patrol Officers and Fire Marshals.
  - We inspect vehicles for every kind of problems that DMV needs assistance on, Non-conforming VIN, Assembled Kit Cars, Street Rods, Trailers, Motorcycles and Antique Vehicles.
  - We also Inspect ALL Towing Companies Vehicles prior to them either obtaining Titles or filing for a Writ's to Dispose of the Vehicles in their possession.
- *Who does the VIN inspections in your state (commissioned/non-commissioned)?*  
They are non-commissioned employees (all former commissioned officers)



- *Where are the VIN inspections done?*  
Inspections are done at our three DMV locations, by appointment at a Troop and at tow yards
- *What are the fees associated with VIN inspections?*  
We do not charge any fees.
- *How many VIN inspectors do you have?*  
It consists of 3 full-time employees and two part-time.
- *How many VIN inspections do you do in an average year?*  
5,661 in 2021.  
1,674 to-date in 2022

#### ***IOWA STATE PATROL:***

- *Do you have a Vehicle Identification Number (VIN) inspection program?*
  - The Iowa State Patrol does not have an official program set up per se. We will do VIN Inspections when requested by the Public, more often with a form from the Out-of-State Agency requesting the inspection.
- *What types of VIN inspections do you do (destroyed/salvaged vehicles, ownership in doubt, VIN verification, VIN does not conform to 17 digits, no VIN, assembled/custom/kit vehicles, lost title, license canceled, etc.)?*
  - The Iowa State Patrol will perform a VIN Verification. We also will verify a VIN for an off-road vehicle such as an ATV,UTV, off-road motorcycle, so it can be titled through the Iowa Department of Natural Resources.
- *Who does the VIN inspections in your state (commissioned/non-commissioned)?*
  - Troopers attached to the Vehicle Theft Unit, sworn.
- *Where are the VIN inspections done?*
  - The VIN Inspections have been none in various locations such as dealerships, vehicle owners residence, Iowa State Patrol local District Office.
- *What are the fees associated with VIN inspections?*
  - VIN Inspections are free when done by the Iowa State Patrol.
- *How many VIN inspectors do you have?*



- There are two members of the Iowa State Patrol Vehicle Theft Unit that perform the inspections.
- *How many VIN inspections do you do in an average year?*
  - 15-20

### **Iowa DOT Investigators-**

- *If you don't, what entity (if any) in your state does VIN inspections?*
  - The Iowa Department of Transportation actually oversees the Salvage Vehicle/ Theft Inspection program and assignment of a new VIN to a vehicle. Web link to DOT site- [Salvage - Motor Vehicle Division \(iowadot.gov\)](http://www.iowadot.gov)
  - The IDOT has a certification program that City and County Agencies can send Officers through that will certify the Officers to complete an inspection on a rebuilt vehicle. If that vehicle is to the point that it will need an Iowa Assigned VIN, then an Investigator from the DOT will take up that responsibility. These are the stats from these types of inspections recorded by the Iowa DOT in 2021:
- Mainly how many vehicles a year get Iowa Assigned Numbers, or Salvage Theft Inspections?  
IA Assigned VIN's: 250
- Salvage Inspections:  
All Law Enforcement Agencies: 13,266
- *Do you have a Vehicle Identification Number (VIN) inspection program?*  
Yes
- *What types of VIN inspections do you do (destroyed/salvaged vehicles, ownership in doubt, VIN verification, VIN does not conform to 17 digits, no VIN, assembled/custom/kit vehicles, lost title, license canceled, etc.*
  - Salvage Vehicle Inspection
  - VIN Verification
  - VIN Assignment
  - Title Bonds
  - Out of State Title and/or Registration Inspection
  - VIN Correction

Imported Vehicles

Non-Conforming Vehicles

Assembled/Kit Vehicles

Specially Constructed/Reconstructed vehicles

Street Rod

Replica vehicles

Misc.

- *What are the fees associated with VIN inspections?*

VIN inspections have no fee

Salvage inspections are \$50 per vehicle (\$40 to the law enforcement agency conducting the exam, \$5 to Iowa Dept. of Transportation, and \$5 to Iowa Law Enforcement Academy)

- *How many VIN inspections do you do in an average year?*

Over 700 inspections per year on average.

#### ***MISSOURI STATE HIGHWAY PATROL:***

- *Do you have a Vehicle Identification Number (VIN) inspection program? Yes. Statute determines which type of examination is required for the given circumstance. More in-depth inspections are done by trained Motor Vehicle Inspection personnel, routine can be performed by other law enforcement*
- *If you don't, what entity (if any) in your state does VIN inspections? NA*
- *What types of VIN inspections do you do (destroyed/salvaged vehicles MVI personnel from MSHP, ownership in doubt MVI personnel from MSHP in most circumstances, VIN verification any LE or MVI personnel from MSHP, VIN does not conform to 17 digits MVI personnel from MSHP in complicated situations, other LE if routine, no VIN MVI personnel from MSHP, assembled/custom/kit vehicles MVI personnel from MSHP, lost title MVI personnel from MSHP, license canceled, etc.)? Our marine officers often help with marine craft VIN services*
- *Who does the VIN inspections in your state (commissioned/non-commissioned)? Our MVI personnel are not commissioned, but some categories above can be LE. Also, Missouri has a clause in statute which allows some larger police agencies to perform the more extensive examinations, but few participate*
- *Where are the VIN inspections done? The full examinations where police VIN's, serial numbers of parts, etc are required are done at one of our state facilities (generally troop HQ facilities) / some can be done in the field*

- *What are the fees associated with VIN inspections? We do not collect fees, but the state's Department of Revenue does for the full examinations (kit vehicles, rebuilt, etc). \$25 fee for the examination form of an in-depth exam. No fee for the basic exams*
- *How many VIN inspectors do you have? 60 inspectors around the state. They also oversee 4,000 safety inspection stations and conduct bus inspections for all school buses in the state*
- *How many VIN inspections do you do in an average year? There are basically three categories of VIN inspections our MVI personnel conduct. They are the following:*
  - *A. Salvage Examination – in-depth check of all components, VIN #s, etc = 20,206 in 2021*
  - *B. Basic VIN verification/title corrections etc – 3,789 in 2021 (other LE can perform these)*
  - *C. Basic Marine Hull identification/title corrections etc - 671 in 2021*

### ***MONTANA DEPARTMENT OF JUSTICE:***

DCI does not do VIN inspections, but I reached out to one of our retired agents who is now working as an investigator for our State Motor Vehicle Division. His responses are below and contact information for any follow up needs.

- *Do you have a Vehicle Identification Number (VIN) inspection program?*

**MT verifies VIN's for salvage vehicles and for any break in ownership title transfer. No specific program.**

- *If you don't, what entity (if any) in your state does VIN inspections?*

**Any law enforcement officer in MT can do a stage 1 VIN, this is for the break in ownership title transfers. The stage 3, salvage inspections, are done by MVD.**

- *What types of VIN inspections do you do (destroyed/salvaged vehicles, ownership in doubt, VIN verification, VIN does not conform to 17 digits, no VIN, assembled/custom/kit vehicles, lost title, license canceled, etc.)?*

**Salvage, break in ownership, lost title.**

- *Who does the VIN inspections in your state (commissioned/non-commissioned)?*

**Both commissioned and non-commissioned can-do inspections in MT. Non-commissioned must be verified and trained by MVD.**

- *Where are the VIN inspections done?*

**They are done everywhere; MT does not have a designated location to do inspections.**



- *What are the fees associated with VIN inspections?*

**Stage 1 inspections are free, Stage 3 inspections are \$18.50.**

- *How many VIN inspectors do you have?*

**These numbers are hard to capture due to so many agencies doing them.**

- *How many VIN inspections do you do in an average year?*

**These numbers are hard to capture due to so many agencies doing them.**

### ***NEW HAMPSHIRE STATE POLICE:***

Do you have a Vehicle Identification Number (VIN) inspection program?

Yes, The NHSP Troop G conducts VIN issuances.

- If you don't, what entity (if any) in your state does VIN inspections?

All vin issuances and salvages for vehicles are acquired through the Title Department at the NH DMV. NHSP Troop G is tasked by the DMV to conduct these assignments.

- What types of VIN inspections do you do (destroyed/salvaged vehicles, ownership in doubt, VIN verification, VIN does not conform to 17 digits, no VIN, assembled/custom/kit vehicles, lost title, license canceled, etc.)?

We conduct Vin's for destroyed/salvaged vehicles, VIN verification, VIN does not conform to 17 digits, no VIN, assembled/custom/kit vehicles. Reconstructed vehicles from multiple vehicles.

- Who does the VIN inspections in your state (commissioned/non-commissioned)?

NHSP Troop G has 8 civilians and 7 sworn personnel that accommodate this program.

- Where are the VIN inspections done?

Inspections are conducted at several assigned locations throughout the state every week. These are called salvage locations. There is also a detail available for sworn personnel to go to the customers' business or residence to conduct these for a 4-hour minimum charge.

- What are the fees associated with VIN inspections?

There is a \$30.00 fee for VIN for vehicles. If a trailer over 3000 pounds we would issue a VIN to that for the same fee. If the trailer was under 3000 pounds the town/city would issue a VIN to that customer at no charge.







- How many VIN inspectors do you have?

NHSP Troop G has 8 civilians and 7 sworn personnel that accommodate this program

- How many VIN inspections do you do in an average year?

We mostly conduct salvages on vehicles but on average we issue 121 VIN's in a calendar year.

#### ***LOUISIANA STATE POLICE BUREAU OF INVESTIGATION FRAUD/AUTO THEFT:***

- *Do you have a Vehicle Identification Number (V.I.N.) inspection program?*
  - **YES**
- *If you don't, what entity (if any) in your state does V.I.N. inspections?*
  - **N/A**
- *What types of V.I.N. inspections do you do (destroyed/salvaged vehicles, ownership in doubt, V.I.N. verification, V.I.N. does not conform to 17 digits, no V.I.N., assembled/custom/kit vehicles, lost title, license canceled, etc.)?*
  - **All of the above**
- *Who does the V.I.N. inspections in your state (commissioned/non-commissioned)?*
  - **Per Louisiana Revised Statute 32:706.2, an inspection can only be performed by a Peace Officer Standards and Training (P.O.S.T.) certified law enforcement officer, who has been trained and certified by the Department of Public Safety and Corrections, office of state police, to inspect motor vehicles. See <https://legis.la.gov/Legis/Law.aspx?d=670640> for the complete text of the statute.**
- *Where are the V.I.N. inspections done?*
  - **They can be performed anywhere within the state on both public and private property**
- *What are the fees associated with V.I.N. inspections?*
  - **There are no fees assessed for the inspections. They are free to the public.**
- *How many V.I.N. inspectors do you have?*
  - **Approximately 5,600. This number includes troopers, sheriff deputies, city police officers, constables, etc., which the LA State Police has certified to conduct physical inspections.**



- How many V.I.N. inspections do you do in an average year?
  - As multiple L.E.O.s can perform these inspections, I do not have the number of inspections completed annually.

#### **LOUISIANA STATE POLICE:**

- Do you have a Vehicle Identification Number (VIN) inspection program? Louisiana State Police does have a VIN Inspection Program (Physical Inspection Program) that is conducted by members of our Transportation and Emergency Safety Services Section and our Insurance Fraud Section.
- If you don't, what entity (if any) in your state does VIN inspections?
- What types of VIN inspections do you do (destroyed/salvaged vehicles, ownership in doubt, VIN verification, VIN does not conform to 17 digits, no VIN, assembled/custom/kit vehicles, lost title, license canceled, etc.)? We conduct VIN verification inspections and destroyed/salvaged vehicle VIN inspection
- Who does the VIN inspections in your state (commissioned/non-commissioned)? Vin Inspections are done by commissioned personnel
- Where are the VIN inspections done? Tow yards, vehicle storage facilities, salvage yards, and Louisiana State Police Headquarters
- What are the fees associated with VIN inspections? There are no fees for VIN Inspections
- How many VIN inspectors do you have? LSP has 40 Vin Inspectors located throughout the state
- How many VIN inspections do you do in an average year? Louisiana State Police conducts roughly 10,000 vin inspections a year.

#### **COLORADO STATE PATROL:**

- Do you have a Vehicle Identification Number (VIN) inspection program?
  - Yes
- If you don't, what entity (if any) in your state does VIN inspections? N/A
- What types of VIN inspections do you do (destroyed/salvaged vehicles, ownership in doubt, VIN verification, VIN does not conform to 17 digits, no VIN, assembled/custom/kit vehicles, lost title, license canceled, etc.)?
  - In Colorado, we have two (2) types of VIN inspections. The first inspection is the Verification of the Vehicle Identification Number. This inspection is completed for out-of-state vehicles, minor title corrections, and certain purged title situations.
  - The second VIN inspection we complete is the certified VIN inspection. This is done for a variety of reasons including, but not limited to, rebuilt from salvage vehicles, bond titles (ownership is not supported by a valid title), missing public VIN, Department of Revenue requests, kit vehicles, and trailers.
- Who does the VIN inspections in your state (commissioned/non-commissioned)?

- The Verification of the Vehicle Identification Number inspection can be completed by any certified peace officer, licensed car dealer, emissions, and county clerks.
- Certified VIN inspections require specialized training that is approved and certified by the State of Colorado P.O.S.T Board. The training is provided by the Colorado State Patrol. The State allows for commissioned and non-commissioned officers to complete the certified inspection. However, the non-commissioned person must be appointed by the Sheriff or Chief of the Law Enforcement agency that employs the individual.
- Where are the VIN inspections done?
  - The inspections can be completed in a variety of settings. However, the vast majority of the certified inspections are completed at our troop offices. There are several reasons for this including access to the specialized equipment needed to access confidential VINs. We also have a specific VIN bay at our Academy grounds.
  - VIN verifications are completed at troop offices as well as at the requestor's locations.
- What are the fees associated with VIN inspections?
  - VIN Verifications are considered a no-charge service by the Colorado State Patrol. However, some of the other entities, outside of CSP, allowed to complete the verification inspections charge a fee.
  - Certified VIN inspections cost \$50.00.
- How many VIN inspectors do you have?
  - We currently have approximately 108 active certified VIN inspectors. The CSP also employs 6 part-time retired officers to assist with certified inspections. In our larger areas, the local troop assigns a trooper to complete the certified inspections, as well as management of abandoned vehicles.

### **NEVADA STATE POLICE:**

- *Do you have a Vehicle Identification Number (VIN) inspection program? The Nevada State Police does not have a specific program for VIN inspections. However, ALL State Troopers carry VIN inspection forms and all substations/offices have them as well. Troopers are dispatched to locations to conduct VIN inspections where they will respond, time permitted. Motorists will often come to substations for them to be conducted.*
- *If you don't, what entity (if any) in your state does VIN inspections? Nevada DMV conducts VIN inspection at their branches. All law enforcement in Nevada can conduct VIN inspections.*
- *What types of VIN inspections do you do (destroyed/salvaged vehicles, ownership in doubt, VIN verification, VIN does not conform to 17 digits, no VIN, assembled/custom/kit vehicles, lost title, license canceled, etc.)? Nevada State Police will inspect all VIN's, however, if the trooper determines that they cannot verify the VIN, then the DMV will need to verify.*

- *Who does the VIN inspections in your state (commissioned/non-commissioned)?* *DMV inspection stations (non-commissioned, however DMV does have sworn officers), Law Enforcement agencies, other DMV approved inspections agencies.*
- *Where are the VIN inspections done?* *VIN inspections are most often performed at DMV inspection stations at their branches. Nevada State Police will conduct VIN inspections at their substations, or, wherever requested (for the most part) responding to locations statewide to inspect VIN's as a courtesy; residences, shops, etc.*
- *What are the fees associated with VIN inspections?* *Nevada State Police do not charge to conduct VIN inspections.*
- *How many VIN inspectors do you have?* *NA*
- *How many VIN inspections do you do in an average year?* *In 2021, Nevada State Patrol received 1481 requests for VIN inspections.*

### **MARYLAND DEPARTMENT OF STATE POLICE:**

- *Do you have a Vehicle Identification Number (VIN) inspection program?* **Yes**
- *If you don't, what entity (if any) in your state does VIN inspections?* **N/A**
- *What types of VIN inspections do you do (destroyed/salvaged vehicles, ownership in doubt, VIN verification, VIN does not conform to 17 digits, no VIN, assembled/custom/kit vehicles, lost title, license canceled, etc.)?* **All mentioned and including, AG's Office Writ of Mandamus, Re-Classed vehicles, MVA investigations, Glider kits, State Fire Marshal's complete burns, Unidentifiable, MSP investigations, and assistance to Allied Agencies.**
- *Who does the VIN inspections in your state (commissioned/non-commissioned)?* **Contractual Civilian State employees (retired Auto Theft LEO's) assisted by sworn non-com.**
- *Where are the VIN inspections done?* **8 locations strategically set throughout the state.**
- *What are the fees associated with VIN inspections?* **\$25.00 set by Md statute.**
- *How many VIN inspectors do you have?* **6 fulltime and 2 sworn Sgt's as needed.**
- *How many VIN inspections do you do in an average year?* **In 2021 we conducted 19,971 salvage inspections.**

### **PENNSYLVANIA STATE POLICE:**

- *Do you have a Vehicle Identification Number (VIN) inspection program?* **Pennsylvania does not have an official VIN inspection program. Any Police Officer can inspect a VIN and conduct a corresponding investigation if there is evidence of fraud, misuse, re-venning, etc. These investigations usually involved the Pennsylvania Department of Motor Vehicles for record reviews. Any third-party license plate registration ("Tag agents") or inspection mechanic can also inspect VINs for accuracy when the vehicle is being titled, sold, or salvaged.**
- *If you don't, what entity (if any) in your state does VIN inspections?* **Any Police Officer in Pennsylvania is capable to conduct VIN inspections. Within the Pennsylvania State Police, we usually include our Auto Theft Task Force Members or Vehicle Fraud**

Investigators during the investigations. We currently have a 20 person Auto Theft Task Force assigned throughout the Commonwealth, which is comprised of Pennsylvania State Police Members and Municipal / Local Police Officers. Our Vehicle Fraud Investigation Unit is based out of our 15 Troop Headquarters throughout the Commonwealth. Each Troop is assigned at least 2 Vehicle Fraud Investigators. They inspect mechanic garages, school buses, inspection stations, and can conduct investigations into fraudulent VINs.

- *What types of VIN inspections do you do (destroyed/salvaged vehicles, ownership in doubt, VIN verification, VIN does not conform to 17 digits, no VIN, assembled/custom/kit vehicles, lost title, license canceled, etc.)?* We conduct all inspections during investigations as you indicated in this question – destroyed / salvaged vehicles, questionable ownership, VIN verification, non-conforming VINs, re-plated VINs, lost titles, etc.
- *Who does the VIN inspections in your state (commissioned/non-commissioned)?* Police Officers and Inspection mechanics are authorized by the Pennsylvania Department of Transportation to complete VIN inspections. As for the Pennsylvania State Police, mostly non-commissioned Members holding the rank of Sergeant and below would conduct inspections. As for Municipal / Local Police agencies, it would depend on their agency.
- *Where are the VIN inspections done?* There is no set location to conduct a VIN inspection. This is determined on a case-by-case basis. Sometimes it could occur at a salvage yard or mechanic's garage. Sometimes it occurs on the street or in a backyard of a residence. It depends upon the investigation.
- *What are the fees associated with VIN inspections?* All VIN inspections conducted by Police Officers are free. VIN inspections at private entities such as at a mechanic's garage or a Tag agent facility may include a cost based on the amount of work needed to confirm the VIN, but this is not set by the Commonwealth of Pennsylvania.
- *How many VIN inspectors do you have?* The Pennsylvania State Police does not have a set number of VIN inspectors. We have 20 Police Officers who comprise the Auto Theft Task Force Unit; and an additional approximate 30+ Troopers who hold positions in the Troop Vehicle Fraud Units.
- *How many VIN inspections do you do in an average year?* This varies year to year, but I would estimate it is around 1,000 for PSP Members alone since our Auto Theft Task Force Unit is growing. We are seeing more and more fraudulent vehicles with fake VIN plates appearing in Pennsylvania. Many of these are initially titled out-of-state and it makes for a convoluted investigation to build a criminal case. Many vehicle owners claim to have purchased the vehicles as is, and have no involvement in the original fraudulent re-vinning of the vehicle. Since the titles are also fraudulent, it is tough to prove their criminal culpability.

## APPENDIX 6 – QUESTIONS SUBMITTED TO AAMVA – SURVEY 2020

The 2020 AAMVA survey asked the following questions:

1. Does your agency or an agency within your jurisdiction check vehicle identification numbers prior to registration?
  - If yes, how much do you charge today for the service?
  - When was the last time the amount changed (increase or decrease)? What was the previous amount?
  
2. Does your agency or an agency within your jurisdiction complete an inspection of a salvage re-built vehicle prior to registration?
  - If so, how much do you charge today for the service?
  - When was the last time the amount changed (increase or decrease)? What was the previous amount?
  
3. Does your agency or an agency within your jurisdiction apply state assigned numbers to a motor vehicle without a vehicle identification number?
  - If so, how much do you charge today for the service?
  - When was the last time the amount changed (increase or decrease)? What was the previous amount?

## Vehicle Fees - Inspection and VIN

### Survey Properties

**Author:** Sawyer, Robert

**Jurisdiction:** NC

**Start Date:** 6/15/2020 12:00:00 AM

**End Date:** 7/10/2020 12:00:00 AM

**Contact Info /** If you have any questions about this survey, please contact Robert Sawyer at [rssawyer@ncdot.gov](mailto:rssawyer@ncdot.gov). Thank you.

**Comments:**

Total Responses: 34

## All Details Sorted by Question

**Question 1: Does your agency or an agency within your jurisdiction check vehicle identification numbers prior to registration?**

- **If yes, how much do you charge today for the service?**
- **When was the last time the amount changed (increase or decrease)? What was the previous amount?**

**User:** [AL] James Starling

**Response:** Yes

**Comments:** Only when the vehicle has not been previously registered in AL

**User:** [AR] Casey Smith

**Response:** Yes

**Comments:** Yes

Arkansas State Police VIN verification for branded and bonded vehicles.  
\$25.00

**User:** [AZ] Anthea Quinn-Hough

**Response:** No

**Comments:** Not as a standard practice for all registrations

**User:** [BC] Tony Carpenetti

**Response:** Yes

**Comments:** On initial registration of a vehicle, a broker/agent is always required to inspect the VIN on the vehicle to ensure that it matches the VIN on the vehicle paperwork as part of maintaining the integrity of our vehicle registry.

The vehicle registration fee is incorporated into our regulations and is \$18 -it includes the VIN inspection and is paid by the applicant. This \$18 fee, in turn (along with vehicle licence fees) are remitted to government as we have a provincial vehicle licencing/insurance framework. The brokers/agents (which are independent businesses) receive commissions from us depending on the transaction. It registration fee has been \$18 for a very long time and have no recollection of when it was last changed in regulation.

**User:** [CT] Christopher Smith

**Response:** Yes

**Comments:** VIN's are only checked on vehicles that have not previously been registered in CT.





The VIN's are checked by private, licensed auto dealers and repair shops and the fee is \$10. The fee has not changed.  
VIN's are also checked for stolen in NMVTIS before a Title is issued to the owner.

**User:** [DC] Tiara Graham

**Response:** Yes

**Comments:** there is no fee charged for this to the customer, DC DMV has an account with carfax

**User:** [DE] Scott Clapper

**Response:** Yes

**Comments:** VIN verification is done by the Delaware Division of Motor Vehicles for all vehicles coming from out-of-state. There is no charge for the verification.

**User:** [IA] Daniel Yeh

**Response:** No

**Comments:** This is not a required part of Iowa vehicle registration except if there is a VIN verification needed for a bonded title.

**User:** [ID] Amy Smith

**Response:** No

**Comments:** VIN inspections are completed prior to first title in Idaho, fee is \$5, previously \$3. Changed in 2012. Completed by county DMV, police officer, licensed motor vehicle dealer, motor vehicle investigators, or DMV staff.

**User:** [KS] Deann Williams

**Response:** Yes

**Comments:** Kansas Highway Patrol completes the VIN Inspections for all out of state titles being registered in Kansas.  
Previous fee was \$10.00. The fee increase to \$20.00 for all inspections with the exception of salvage vehicles and that inspection fee is \$25.00. Fee increase two or three years ago.

**User:** [KY] Godwin Onodu

**Response:** No

**Comments:** VIN is checked only when the vehicle is coming from another State/Jurisdiction, or if the vehicle is rebuilt/reconstructed. The fee is \$5 if the vehicle is brought to an inspection site, otherwise, it would be \$15.

**User:** [LA] Lauren Debetaz

**Response:** No

**Comments:**







**User:** [ME] Ronald Rioux

**Response:** No

**Comments:**

**User:** [MN] Craig Plummer

**Response:** No

**Comments:**

**User:** [MO] Tammy Stayton

**Response:** No

**Comments:**

**User:** [MS] Lisa Chism

**Response:** No

**Comments:**

**User:** [NC] Loretta Hall

**Response:** No

**Comments:**

**User:** [ND] Cara DeSaye

**Response:** No

**Comments:**

**User:** [NE] Betty Johnson

**Response:** Yes

**Comments:** VIN inspections are required prior to transfer of title from out-of-state to Nebraska.  
The fee is currently \$10, the last change was greater than 25 years ago.

**User:** [NH] Kathleen Dymont

**Response:** No

**Comments:**

**User:** [NJ] Tameshia Russell



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Olympia, WA 98502



**Response:** Yes

**Comments:** However, only when requested by title unit. No charge.

**User:** [NM] Michelle Carreno

**Response:** Yes

**Comments:** If the vehicle is transferring to NM from out of state, yes a VIN inspection is required. This service is free of charge at any of our state offices however, Private/ Municipal offices may include their own service fees.

**User:** [NT] Sarah Cassell

**Response:** No



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**Comments:** We check the VIN at the time of registration.

**User:** [NY] Owen McShane

**Response:** No

**Comments:** We sometimes receive requests for VIN Verifications from Military Members which are conducted by our Motor Vehicle Investigators at no charge.

**User:** [OR] Tracy Olander

**Response:** Yes

**Comments:** It depends. We check the VIN at the time a vehicle is first titled in Oregon if it is coming in with an out-of-state title; or if there has been a notification from an insurance company that the vehicle was totaled, or a salvage title is being turned in for a reconstructed title. Those are the only times we are required to verify the VIN matches title documents.  
We charge \$7. It's been \$7 for the decade that I've been working here. I do not know when the fee was last raised, and that would require statutory research I don't have the reference materials for while working from home.

**User:** [PA] Joshua Kline

**Response:** Yes

**Comments:** Third party agents are required to check the VIN of all OOS vehicles prior to title and registration. Vin inspection can be done by the following in PA:

1. A certified Pennsylvania inspection station mechanic.
  2. A notary public employed by one of the following:
    - a. A person to whom manufacturer or dealer registration plates have been issued under 75 Pa.C.S. §1335 (relating to registration plates for manufacturers and dealers).
    - b. An authorized full agent, as defined in Title 67, Chapter 43 (relating to temporary registration cards and plates).
  3. If the vehicle is located outside of this Commonwealth one of the following:
    - a. A police officer.
    - b. A mechanic employed by a dealer.
    - c. An armed forces installation provost marshal or motor officer
- Prices charged by the above parties are market driven and subject to the individual's/business' discretion

**User:** [RI] Doug Staradumsky

**Response:** Yes



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**Comments:** We do require VIN verification prior to registration in Rhode Island, however, this has been temporarily suspended due to the Covid-19 pandemic. The fee is \$10.00 and the service is performed by the local police departments. The fee has not changed any time recently.

**User:** [SC] Debra Tucker-Brown

**Response:** Yes

**Comments:** VINs are verified through VinTelligent, not physically inspected on the vehicle. There is no additional charge for this service.

**User:** [UT] David Montgomery

**Response:** Yes

**Comments:** In Utah, we require VIN inspections for any vehicle being registered in Utah for the first time. If there is a pre-existing record in Utah, a VIN inspection is not required. If the VIN inspection is done at a DMV Office there is no charge. A licensed auto service shop can also perform a VIN inspection, and they may charge a small fee for that service. The amount charged by licensed auto service shops varies depending on the county it is in, and by how much they choose to charge within their county set limits.

**User:** [VA] Benjamin Moriarty

**Response:** No

**Comments:**

**User:** [WA] Jennifer Brown

**Response:** No

**Comments:** If a VIN error arises for a vehicle that is currently titled in Washington, a Washington State Patrol inspection is required, depending on the situation it could either be a no fee or \$65. The previous fee was \$40, the increase to \$65 occurred in 2001.

**User:** [WV] Richard Allen

**Response:** No

**Comments:** For normal titling circumstances we do not check inspect the VIN, but for issues with VIN discrepancies we do sometimes send our Dealer Inspectors out to check or we require customers to have a VIN verification completed by the police. DMV does not charge when conducting a VIN inspection, but I believe the police sometimes charge \$5.

**User:** [WY] Debbie Lopez

**Response:** Yes

**Comments:** VIN inspections are only required for vehicles that are coming from another State into Wyoming to be registered. Law Enforcement will provide the VIN inspection, and the County will collect the fee when the vehicle is titled.



Current VIN inspection Fee \$10.00  
Prior to July 1, 2013, VIN inspection Fee \$5.00

**Question 2: Does your agency or an agency within your jurisdiction complete an inspection of a salvage re-built vehicle prior to registration?**

- **If so, how much do you charge today for the service?**
- **When was the last time the amount changed (increase or decrease)? What was the previous amount?**

**User:** [AL] James Starling

**Response:** Yes

**Comments:** The inspection is completed prior to titling as a rebuilt vehicle. \$75. 1995?

**User:** [AR] Casey Smith

**Response:** Yes

**Comments:** Yes

Arkansas State Police VIN verification for branded and bonded vehicles.  
\$25.00

**User:** [AZ] Anthea Quinn-Hough

**Response:** Yes

**Comments:** Depending on the level of inspection; either \$20 or \$50

**User:** [BC] Tony Carpenetti

**Response:** Yes

**Comments:** Our regulations require that passenger/light commercial vehicles always undergo a mechanical safety/structural integrity inspection when going from salvage to re-built status. These inspections are conducted by designated inspection facilities (DIFs) which are private enterprises (garages/dealerships) that have been approved as inspection facilities by our Ministry of Transportation and Infrastructure. There is no fixed fee for these inspections and the DIFs are free to set their own rates.

**User:** [CT] Christopher Smith

**Response:** Yes

**Comments:** The CT DMV charges and performs a salvage inspection prior to registering the vehicle. The fee is \$88. and was raised from \$25 in 1993.

**User:** [DC] Tiara Graham



**Response:** Yes

**Comments:** Dc dmv does not charge any additional fees for salvage except \$13 for a temporary tag until the police department runs their auto theft on the vehicle. More information on DC DMV salvage process can be found here <https://dmv.dc.gov/service/salvage-vehicle>

**User:** [DE] Scott Clapper

**Response:** Yes

**Comments:** Salvage vehicles are inspected by the Delaware Division of Motor Vehicles and the Delaware State Police Auto Theft Unit before being titled with a rebuilt brand. There is no charge for either inspection.

**User:** [FL] Amanda Gerardino

**Response:** Yes

**Comments:** Yes, a \$40 inspection fee. This fee has been in place for 20+ years and we cannot determine what the previous fee was.

**User:** [IA] Daniel Yeh

**Response:** Yes

**Comments:** \$50. <https://iowadot.gov/mvd/vehicleregistration/salvage>

**User:** [ID] Amy Smith

**Response:** No

**Comments:** Customer has to complete specific paperwork about rebuilt salvage vehicles including receipts, work completed and by whom along with previous title.

**User:** [KS] Deann Williams

**Response:** Yes

**Comments:** \$25.00

**User:** [KY] Godwin Onodu

**Response:** Yes

**Comments:** The charge is \$5.00 and it was implemented in 1982, 38 years ago, and it has not changed.

**User:** [LA] Lauren Debetaz

**Response:** Yes





**Comments:** A P.O.S.T. certified law enforcement officer performs a physical inspection of the vehicle prior to the paperwork being submitted. The Louisiana Office of Motor Vehicles does not govern this, please contact Louisiana State Police for additional information.

**User:** [ME] Ronald Rioux

**Response:** No

**Comments:**

**User:** [MN] Craig Plummer

**Response:** Yes

**Comments:** MN charges a \$35 inspection fee. This fee increased from \$20 in 2005

**User:** [MO] Tammy Stayton

**Response:** Yes

**Comments:** \$25 for law enforcement VIN Inspection  
\$12 for safety inspection

**User:** [MS] Lisa Chism

**Response:** Yes

**Comments:** \$75

**User:** [NC] Loretta Hall

**Response:** Yes

**Comments:** No charge

**User:** [ND] Cara DeSaye

**Response:** Yes

**Comments:** If the vehicle is deemed to be salvage, we require an inspection which is not done by our agency, but by an inspection facility, who offers vehicle repair to the public and is registered with the Secretary of State and in good standing. Fees would vary according to the inspection facility.

**User:** [NE] Betty Johnson

**Response:** Yes

**Comments:** Again, a VIN inspection is completed (no safety inspection). Same fee as question





**User:** [NH] Kathleen Dymont

**Response:** Yes

**Comments:** \$50.00

**User:** [NJ] Tameshia Russell

**Response:** Yes

**Comments:** Inspection charge is \$200.00 per vehicle and \$100.00 per motorcycle. Fee only covers the inspection. Titling and registration charges separately charged by

**User:** [NM] Michelle Carreno

**Response:** Yes

**Comments:** If the vehicle is transferring to NM from out of state, yes a VIN inspection is required. This service is free of charge at any of our state offices however, Private/ Municipal offices may include their own service fees.

**User:** [NT] Sarah Cassell

**Response:** No

**Comments:** Inspections are completed through a certified mechanic if salvare or re-built prior to registration.

**User:** [NY] Owen McShane

**Response:** Yes

**Comments:** Salvage examinations are conducted by Motor Vehicle Investigators, that are sworn Peace Officers. The fee for examination is \$150 and has been set at that rate since 2014. Prior to that the fee was \$100.

**User:** [OR] Tracy Olander

**Response:** No

**Comments:** No, only VIN verification and, if necessary, referral to law enforcement to inspect hidden VINs.

**User:** [PA] Joshua Kline

**Response:** Yes

**Comments:** No salvage vehicle can be issued a PA title or registration until it undergoes an enhanced vehicle inspection and is approved by the mechanic to be in compliance with FMVSS.  
Prices charged by the above parties are market driven and subject to the individual's/business' discretion.



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Ste 140-723  
Olympia, WA 98502





**User:** [RI] Doug Staradumsky

**Response:** Yes

**Comments:** Salvage inspections are performed by RI DMV. The fee is \$55.00 and has not changed any time recently.

**User:** [SC] Debra Tucker-Brown

**Response:** Yes

**Comments:** No physical inspection is required. Customers must provide documented verification that work completed used OEM parts and was properly installed. Photos of the completed work and parts are required and placed in the customer's electronic file. There is no additional charge for this service.

**User:** [UT] David Montgomery

**Response:** Yes

**Comments:** In Utah, a Salvage vehicle must have a Safety Inspection before it can be changed to a "Rebuilt/Restored" branded vehicle. Safety Inspections are conducted by licensed auto service shops throughout the state, and they charge the fee for the Safety Inspection. Each county in Utah can set the maximum amount that can be charged for the Safety Inspection, so the fee varies from shop to shop.

**User:** [VA] Benjamin Moriarty

**Response:** Yes

**Comments:**

**User:** [WA] Jennifer Brown

**Response:** Yes

**Comments:** A Washington State Patrol inspection is required after the vehicle has been salvaged and rebuilt in WA before the vehicle can be titled and registered again, if the vehicle is not insurance destroyed owner retained. The inspection fee is \$65. The previous fee was \$40, the increase to \$65 occurred in 2001.

**User:** [WV] Richard Allen

**Response:** Yes

**Comments:** Yes, we have inspectors who are available at regional DMV offices on specific days each month which perform Salvage Inspections. The cost for a salvage inspection is currently \$35.50. Afterwards the customer must also pay their titling fees, etc. I am not sure when the last time the fee changed, but it has been this fee for many years.

**User:** [WY] Debbie Lopez

**Response:** Yes



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**Comments:** Salvage Rebuilt vehicles are not inspected for safety. They are only inspected to verify that the "rebuilt" decal is placed on the vehicle. There is no fee for a "rebuilt" decal, nor for the inspection of the decal.

**Question 3: Does your agency or an agency within your jurisdiction apply state assigned numbers to a motor vehicle without a vehicle identification number?**

- **If so, how much do you charge today for the service?**
- **When was the last time the amount changed (increase or decrease)? What was the previous amount?**

**User:** [AL] James Starling

**Response:** Yes

**Comments:** No charge

**User:** [AR] Casey Smith

**Response:** Yes

**Comments:** Arkansas provides ARVIN numbers to vehicles without a VIN. Most of Arkansas's assigned VIN's are for trailers. We do not charge additional fees.

**User:** [AZ] Anthea Quinn-Hough

**Response:** Yes

**Comments:** \$5



**User:** [BC] Tony Carpenetti

**Response:** Yes

**Comments:** All vehicles (even off-road vehicles) are required to have legible and matching public VINs (if more than one) before they may be registered. If they do not meet the criteria they may apply for a British Columbia Assigned VIN which is attached to their vehicle at a local Designated Inspection Facility. The fee to apply for the BC assigned VIN is \$25, then it's up to the DIF to charge the customer whatever they see fit to install the assigned VIN.

**User:** [CT] Christopher Smith

**Response:** Yes

**Comments:** CT DMV may assign a 5 digit VIN to a vehicle with a missing or altered VIN. The fee is \$50 and was increased from \$15 15 yrs ago.

**User:** [DC] Tiara Graham

**Response:** Yes

**Comments:** We do not charge extra for this we create a VIN number for the vehicle if it doesn't currently have a VIN.

**User:** [DE] Scott Clapper

**Response:** Yes

**Comments:** The charge is \$2.00. The fee has never been changed.

**User:** [FL] Amanda Gerardino

**Response:** Yes

**Comments:** Yes, a \$40 inspection fee. This fee has been in place for 20+ years and we cannot determine what the previous fee was.

Contact:  
Palmer Brand, PalmerBrand@flhsmv.gov

**User:** [IA] Daniel Yeh **Response:**

Yes **Comments:** \$0

**User:** [ID] Amy Smith

**Response:** Yes

**Comments:** \$25 Motor Vehicle Investigator fee

\$18 VIN Assignment fee  
Last fee increase was 2012. Previous amount was \$12 for MVI fee and \$10 VIN assignment fee.

**User:** [KS] Deann Williams

**Response:** Yes **Comments:**

\$20.00



**User:** [KY] Godwin Onodu

**Response:** Yes

**Comments:** At this time, there is no charge. Please note that a legislation was filed two years ago requesting for a \$10 fee for this service, but it did not pass.

**User:** [LA] Lauren Debetaz

**Response:** Yes

**Comments:** A P.O.S.T. certified law enforcement officer can issue a state assigned VIN. The Louisiana Office of Motor Vehicles does not govern this, please contact Louisiana State Police for additional information.

**User:** [ME] Ronald Rioux

**Response:** Yes

**Comments:** The Bureau charges \$33.00 (same as Maine title fee). Fee came into play 2010. Previous fee was \$33.00.

**User:** [MN] Craig Plummer

**Response:** Yes

**Comments:** There is no fee for VIN inspections (to verify there is no VIN attached to the vehicle) or to assign a BlueVIN

**User:** [MO] Tammy Stayton

**Response:** Yes

**Comments:** VIN issuance fee is \$13.50.

**User:** [MS] Lisa Chism **Response:**

Yes **Comments:** No Charge

**User:** [NC] Loretta Hall **Response:**

Yes **Comments:** No charge

**User:** [ND] Cara DeSaye

**Response:** Yes

**Comments:** This would be a North Dakota assigned VIN number that is designated only for homemade vehicles that pass inspection to be road worthy. The cost is figured in with our title fee, which is minimal- \$5, this fee has not changed for many years.

**User:** [NE] Betty Johnson

**Response:** No **Comments:**

**User:** [NH] Kathleen Dymont

**Response:** Yes

**Comments:** \$50.00 though our salvage inspection

**User:** [NJ] Tameshia Russell

**Response:** Yes **Comments:** No charge.

**User:** [NM] Michelle Carreno

**Response:** Yes

**Comments:** When a stolen vehicle is recovered by law enforcement or the P VIN has been damaged or removed and reported to law enforcement, the vehicle may be titled using a NM assigned VIN requested by law enforcement following completion of a Level 3 VIN inspection. The applicant must also provide all the required documents.

Upon determining the need for a New Mexico Assigned VIN:

1. The certified Level 3 VIN inspector will email to the Dealers Services Bureau (DSB) a VIN inspection form to request the assignment of a NM Assigned VIN foil tag. The VIN inspection form request must contain the owners name, year, make, chassis VIN, and in the notes a reason for the request.

2. If the VIN inspection form request is complete and accurate, DSB will assign the vehicle a NM Assigned VIN and send the corresponding NM assigned VIN foil tag to the certified Level 3 VIN inspector via trackable mail delivery.

3. The certified Level 3 VIN inspector will attach the foil tag to the vehicle and complete a Level 3 VIN inspection. The Level 3 VIN inspection must include a police report number in the notes.

4. The certified Level 3 VIN inspector will email the completed Level 3 VIN inspection form to DSB. The email must include what MVD office the customer will be going to. The inspector will inform the owner to take the vehicle and the title to the vehicle to that MVD office.

5. The customer will bring the vehicle and title to the vehicle to the MVD field office where an MVD agent will verify the assigned VIN has been attached correctly.

6. Upon verifying that the customer has met all requirements, the MVD agent will issue a certificate of title with the NM assigned VIN as secondary VIN and the chassis VIN as primary VIN.

**User:** [NT] Sarah Cassell

**Response:** Yes

**Comments:** For homemade trailers and there is no fee.

**User:** [NY] Owen McShane

**Response:** Yes

**Comments:** The fee is \$25 and has been at that level since we began the process in 1974. the Volume is low, around 200 per year. The process is completed by our Motor Vehicle Investigators.

**User:** [PA] Joshua Kline

**Response:** Yes

**Comments:** Upon proper application, PennDOT will issue a VIN plate to a vehicle. There is no fee charged for a VIN issuance.

**User:** [RI] Doug Staradumsky

**Response:** Yes

**Comments:** VIN issuances are performed by RI DMV. The fee is \$55.00 and has not changed any time recently.

**User:** [SC] Debra Tucker-Brown

**Response:** Yes

**Comments:** Yes. The fee for this service is a \$15.00 title fee. The fee changed in 1998 and has remained \$15.00 until the present date. The fee was previously \$2.00.

**User:** [UT] David Montgomery

**Response:** Yes

**Comments:** There is no charge to assign a state number to a motor vehicle in Utah.

**User:** [VA] Benjamin Moriarty

**Response:** Yes

**Comments:** A VIN plate issuance for a motor vehicle consists of the following fees: \$5.00 VIN application, \$125.00 examination fee, and \$15.00 title fee. There has been no change in the VIN fee of \$5 since 1997.

**User:** [WA] Jennifer Brown

**Response:** Yes

**Comments:** The current fee is \$65. The previous fee was \$40, the increase to \$65 occurred in

**User:** [WV] Richard Allen

**Response:** Yes

**Comments:** Yes, our Special Plates department assigns and creates VIN plates when needed. We charge \$5 for a VIN plate or duplicate VIN plate. This cost has been the same since

**User:** [WY] Debbie Lopez

**Response:** Yes

**Comments:** The cost to apply for a State Assigned VIN is \$20.00. The cost prior to July 1, 2020 was \$1.00.

## APPENDIX 7 – QUESTIONS SUBMITTED TO AAMVA – SURVEY 2021

The AAMVA Survey of 2021 asked the following questions about assigning VIN numbers to vehicles:

1. Does your jurisdiction assign VINs for vehicles? If yes, please describe the reasons a VIN may be assigned in your jurisdiction?
2. Does your jurisdiction require an examination/inspection of the vehicle for which an assigned VIN is being requested?
3. If your jurisdiction requires an examination/inspection of the vehicle, who performs the examination, your organization, another public agency, or a private company?
4. Is the vehicle owner required to pay a fee for this examination/inspection?
5. If the vehicle owner is required to pay a fee for this examination, how much?
6. Are any of the fees collected for the examination/inspection or assigning the VIN returned to your jurisdiction?
7. What documents do you require for the assigned VIN to be registered on your vehicle registration system?

## APPENDIX 8 – SURVEY OF RESPONDERS OF PREVIOUS AAMVA SURVEYS - 2023

The VIN Program Manager emailed 54 responders from previous AAMVA surveys to ask the following questions. There were 7 emails returned and 7 responses. Of those responding only 4 provided staff pay information.

1. If you have a dedicated workforce doing only VIN inspections, how many employees and what is the pay for those positions?

1. If your program does similar inspection types, what is the standard amount of time these inspections take?
2. Approximately how many VIN inspections do you conduct a year?
3. Does our VIN program do more, less or equal to the types of inspections performed by your program?

STATE	If you have a dedicated workforce doing only VIN inspections, how many employees and what is the pay for those positions?	If your program does similar inspection types, what is the standard amount of time these inspections take?	Approximately how many VIN inspections do you conduct a year?	Does our VIN program do more, less or equal to the types of inspections performed by your program?	Fees
Connecticut	<p>Non-sworn CT state employees for in-state VINs - no number given - Pay = \$ 4,948 - \$ 6,382.75</p> <p>Outsourced agents for all out-of-state VINs - 1,500 at 250 shops</p>	1 Hour	Through the Vendor 30,000	<p>The same</p> <p>Salvage Vehicles Kit Vehicles Homemade Vehicles Glider Kits Street Rod Vehicles Custom Vehicles Vehicles subject to ownership in doubt (OID)</p>	
Idaho	Idaho does not employ personnel dedicated to VIN inspections. The Transportation Department employs nine motor vehicle investigators throughout the state who may complete VIN	A standard VIN inspection takes only a few minutes. More complicated cases, such as resolving mismatched vehicle VINs or finding confidential VINs,	Given VIN inspections are performed by multiple entities, we cannot provide an accurate number.	The most comparable positions in Idaho are motor vehicle investigators. However, these positions are also tasked with vehicle dealer enforcement along with resolving titling	



	<p>inspections in conjunction with other vehicle titling tasks (i.e. street rods, assembled vehicles, etc.). Otherwise, county personnel and law enforcement complete VIN inspections. The pay range for the motor vehicle investigator positions is between about 20-29 dollars per hour. \$ 3,466.67 - \$ 5,026.67</p>	<p>may take a half-hour or more.</p>		<p>issues (including assigning unique VINs). Performing VIN inspections is a very minor part of this role. Rarely do these individuals perform stand-alone VIN inspections; that task is usually part of a larger transaction. As such, it would appear Idaho's program encompasses more than Washington's.</p>	
Wyoming	<p>Each law enforcement agency in Wyoming manages their own VIN inspections, some of them designate specific positions within the agency to conduct VIN inspections, but that is not their sole responsibility.</p> <p>Sorry that we can't be of more help.</p>				
Florida	<p>No dedicated staff, these are handled as part of the overall work load of our Dealer Services and County tax collector staff.</p>				
Mississippi	<p>They have 5 commissioned and 4 civilians. They do fewer inspection types than we do. Their civilians get paid \$25.00 per hour. \$ 4,333.34</p>			Less	
New York	<p>We have 9 fixed examination sites and 5 outposts</p>		30,000+	We examine all VIN's on the vehicles and	We charge \$150 for the exam and

	<p>(garages owned by other state agencies) that we use for conducting vehicle sites. We also use the facilities for issuing NYS Replacement VIN's and any questionable vehicles. The examinations are conducted by Motor Vehicle Investigators. Statewide we have 100+ investigators and 25-30 conduct vehicle examinations on a typical day. Our Investigators are sworn, armed investigators and the starting salary is \$61,270. Investigators assigned to the NYC metro region receive an additional \$3,026 annual downstate adjustment. \$ 5,105.84 - upstate \$ 5,358</p>		<p>Annually we examine over 30,000 vehicles and the majority are salvage vehicles.</p>	<p>component parts. In NYC we obtain locations from NICB and they restrict access to sworn Police &amp; Peace Officers Only.</p> <p>In 2022 we recovered 231 stolen vehicles valued at \$7,240,28 and 81 stolen parts valued at \$67,223.</p>	<p>\$50 for the title fee's.</p>
<p>Maine</p>	<p>The Maine Bureau of Motor Vehicles does not have a dedicated workforce that does VIN inspections. The responsibility for inspecting VINs is handed to our sworn law enforcement officers.</p>		<p>This is not a data point that we are currently tracking exclusively. Based on the 2022 case coding, detectives were assigned to do 136 VIN inspections. These would be cases in which the inspection was the only aspect of the case.</p>	<p>It appears that your program does more inspections than Maine's program</p> <p>In Maine salvage inspections are not mandatory. Applicants for a rebuilt salvage vehicle apply for title with documentation that indicates the extent of the repairs that were made to the vehicle. If there are any indicators of fraud or misrepresentation the application is</p>	

				<p>referred to a detective to examine the vehicle. The examinations vary in length depending on the type of vehicle, and whether the vehicle needs to be examined at a repair station.</p> <p>Maine requires an inspection of a Motor vehicle before a warranty title can be issued for Vehicles that meet The criteria for an antique Motor vehicle that is substantially maintained. Detectives assigned to The BMV perform these inspections.</p> <p>Maine may require a VIN verification that is performed by law enforcement or an inspection station if needed for processing titles. Any sworn law enforcement officer or licensed inspection station can complete this verification form.</p>	
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