



# Washington State Department of Transportation Toll Division

Proviso Report - Fiscal Year 2020, Quarter 4

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**Ed Barry**, Director of Toll Division  
**Roger Millar**, Secretary of Transportation

***Good To Go!***<sup>™</sup>



# 1. Civil Penalty Process for Toll Violations

## Summary:

This report is for the period April 1, 2020, through June 30, 2020 and addresses requirements in Section 209 (4) of ESHB 1160 regarding WSDOT's Toll Civil Penalty Process.

### During the Q4 FY2020 period:

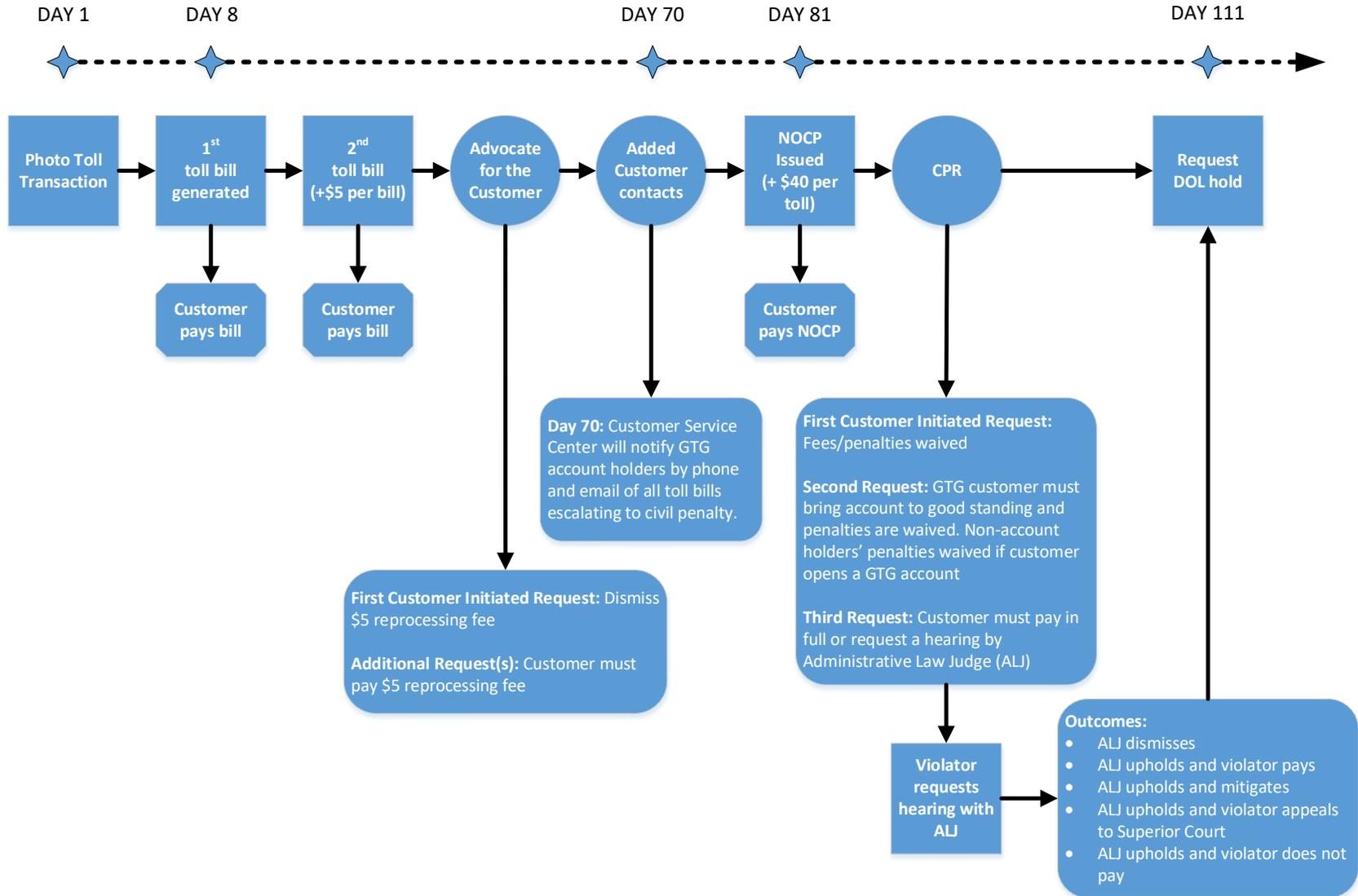
- WSDOT assessed 402,226 civil penalties for unpaid toll trips
  - Due to COVID-19 there has been less people using the toll roads and thus fewer transactions are escalating to the civil penalty.
- During the same period, WSDOT recovered approximately \$1,699,798 in unpaid tolls and \$2 million in penalties and fees (these totals include cash received from uncollected civil penalty revenue from previous time periods).
- 31,770 civil penalty transactions, 7.9 percent of those issued, were paid without any dispute.
- 39 hearing requests (tele-hearings and written) were made representing 1,093 civil penalty transactions, which is less than 1 percent of all civil penalties issued.
- Civil penalty revenue from FY20 Q4 is currently unavailable. The FY 2020 Q4 Financial Statements have not been finalized as OFM has extended the deadline to close out FY 2020 to Sept. 4, 2020 due to COVID. The civil penalty revenue from FY 2020 Q4 will be reported in the summary for FY 2021 Q1.

In June 2019, WSDOT changed from in-person hearings to tele-hearings. Tele-hearings are conducted by the Office of Administrative Hearings (OAH) and offer the customer the convenience of calling in for their scheduled hearing.

Beginning in Q4 FY 2018, WSDOT expanded the scope of the mitigation program allowing for customer service representatives to mitigate transactions in lieu of a hearing. This process has reduced the overall number of cases heard by administrative law judges as well as work load costs. This has also caused a slight decrease in the amount of civil penalty tolls and fees collected.

**Figure 1** shows the current NOCP process diagram and how the Customer Program for Resolution is integrated with the original process. The graphic shows multiple points where the customer is given the opportunity to pay/resolve toll issues along the way.

**Table 1** shows the NOCP data for this quarterly report and the accumulated year-to-date for FY 2019 (Q1 through Q4). Each line item is numbered and corresponds to the entries of the Item Details list.



### Toll Transaction to NOCP Process

Figure 1: NOCP Process

**NOCP Quarterly Report**

	FY 2020 Q4				SR 16 Tacoma Narrows Bridge				I 405 Express Toll Lanes				SR 520 Bridge				SR 99 Tunnel				FY20 Year To Date				
	FY20 Q1	FY20 Q2	FY20 Q3	FY20 Q4	FY20 Q1	FY20 Q2	FY20 Q3	FY20 Q4	FY20 Q1	FY20 Q2	FY20 Q3	FY20 Q4	FY20 Q1	FY20 Q2	FY20 Q3	FY20 Q4	FY20 Q1	FY20 Q2	FY20 Q3	FY20 Q4	TNB	I-405	SR 520	SR 99	Combined
<b>Administrative Hearing Requests</b>																									
4	Number of civil penalty transactions paid upon receipt of the NOCP	11,517	9,803	8,335	6,307	12,332	11,537	8,792	6,683	27,401	25,468	15,835	12,060	**	**	12,266	6,720	35,962	39,344	80,764	18,986	175,056			
5	Number of written administrative hearings requested	0	1	0	1	1	0	0	0	0	2	1	1	**	**	0	0	2	1	4	0	7			
6	Number of civil penalty transactions related to written hearings	0	9	0	1	1	0	0	0	0	17	9	17	**	**	0	0	10	1	43	0	54			
7	Number of administrative tele-hearings	7	10	12	4	8	7	7	14	24	15	19	19	**	**	0	0	33	36	77	0	146			
8	Number of civil penalty transactions related tele-hearing requests	47	61	182	129	115	132	167	229	570	713	909	716	**	**	0	1	419	643	2,908	1	3,971			
9	Number of civil penalty transactions which did not receive a response	135,444	132,995	97,333	79,047	114,730	116,192	76,090	56,457	209,108	207,247	128,414	103,136	**	**	80,054	50,648	444,819	363,469	647,905	130,702	1,586,895			
10	<b>Total number of administrative hearings requested</b>	<b>7</b>	<b>11</b>	<b>12</b>	<b>5</b>	<b>9</b>	<b>7</b>	<b>7</b>	<b>14</b>	<b>24</b>	<b>17</b>	<b>20</b>	<b>20</b>	<b>**</b>	<b>**</b>	<b>0</b>	<b>0</b>	<b>35</b>	<b>37</b>	<b>81</b>	<b>0</b>	<b>153</b>			
11	<b>Total number of civil penalty transactions related to requested administrative hearings</b>	<b>47</b>	<b>70</b>	<b>182</b>	<b>130</b>	<b>116</b>	<b>132</b>	<b>167</b>	<b>229</b>	<b>570</b>	<b>730</b>	<b>918</b>	<b>733</b>	<b>**</b>	<b>**</b>	<b>0</b>	<b>1</b>	<b>429</b>	<b>644</b>	<b>2,951</b>	<b>1</b>	<b>4,025</b>			
<b>Customer Service Reform Results (CPR and Mitigation)</b>																									
12	Number of customer contacts related to customer relief programs	23,220	39,117	26,360	21,423	21,379	36,017	22,546	18,457	37,189	62,650	35,789	31,309	**	**	31,580	25,443	110,119	98,399	166,938	57,023	432,479			
13	Number of civil penalty transactions w/civil penalty & fees waived	46,107	65,831	56,110	62,260	42,453	60,614	47,992	53,638	73,846	105,437	76,183	90,988	**	**	67,223	73,942	230,308	204,697	346,454	141,165	922,623			
14	Dollar value of civil penalty & fees waived	\$1,844,283	\$2,633,252	\$3,323,223	\$1,435,348	\$1,698,117	\$2,424,558	\$2,842,403	\$1,236,587	\$2,953,840	\$4,217,470	\$4,512,077	\$2,097,667	**	**	\$3,981,417	\$1,704,678	\$9,236,105	\$8,201,666	\$13,781,054	\$5,686,095	\$36,904,920			
<b>NOCP Revenue, Cash Collected and Debt Collection Costs</b>																									
15	Civil penalty revenue recognized (financial statements)	\$666,888	\$810,503	\$581,448	***	(\$417,529)	\$1,812,059	\$993,732	***	\$1,596,380	\$1,775,007	\$666,847	***	**	**	\$257,737	***	\$2,058,840	\$2,388,261	\$4,038,234	\$257,737	\$8,743,072			
16	Cash collected related to civil penalty tolls	\$394,168	\$420,876	\$492,404	\$523,208	\$309,200	\$350,105	\$379,397	\$378,191	\$565,428	\$755,589	\$623,396	\$575,223	**	**	\$76,847	\$223,176	\$1,830,656	\$1,416,893	\$2,519,636	\$300,023	\$6,067,208			
17	Cash collected related to \$40 civil penalty & fees	\$448,249	\$454,129	\$544,382	\$348,906	\$469,056	\$496,400	\$492,171	\$397,826	\$868,432	\$1,105,574	\$971,828	\$690,394	**	**	\$345,554	\$632,140	\$1,795,666	\$1,855,453	\$3,636,228	\$977,694	\$8,265,041			
18	<b>Total cash received related to debt collection activities</b>	<b>\$842,417</b>	<b>\$875,005</b>	<b>\$1,036,786</b>	<b>\$872,114</b>	<b>\$778,256</b>	<b>\$846,505</b>	<b>\$871,568</b>	<b>\$776,017</b>	<b>\$1,433,860</b>	<b>\$1,861,163</b>	<b>\$1,595,224</b>	<b>\$1,265,617</b>	<b>**</b>	<b>**</b>	<b>\$422,401</b>	<b>\$855,316</b>	<b>\$3,626,322</b>	<b>\$3,272,346</b>	<b>\$6,155,864</b>	<b>\$1,277,717</b>	<b>\$14,332,249</b>			
19	Workload costs related to debt collection activities	\$153,427	\$215,606	\$174,337	\$120,381	\$142,465	\$202,986	\$162,437	\$100,771	\$253,238	\$356,225	\$249,599	\$168,893	**	**	\$130,050	\$91,753	\$663,751	\$608,659	\$1,027,955	\$221,803	\$2,522,168			
20	<b>Net cash received related to debt collection activities (Quarterly)</b>	<b>\$688,990</b>	<b>\$659,399</b>	<b>\$862,449</b>	<b>\$751,733</b>	<b>\$635,791</b>	<b>\$643,519</b>	<b>\$709,131</b>	<b>\$675,246</b>	<b>\$1,180,622</b>	<b>\$1,504,938</b>	<b>\$1,345,625</b>	<b>\$1,096,724</b>	<b>**</b>	<b>**</b>	<b>\$292,351</b>	<b>\$763,563</b>	<b>\$2,962,571</b>	<b>\$2,663,687</b>	<b>\$5,127,909</b>	<b>\$1,055,914</b>	<b>\$11,810,081</b>			

Footnotes:  
 \*\*There is no existing data for FY2020 Q1 and Q2 for the SR-99 Tunnel. Tolling started November 2019 and trips started escalating to civil penalty stage in FY2020 Q3.  
 \*\*\* FY20 Q4 Financial Statements are currently unavailable as OFM has extended the deadline to close out FY2020 to September 4th, 2020 due to COVID. The civil penalty revenue from FY20 Q4 will be reported in the summary for FY21 Q1.

### **NOCP Quarterly Data Item Details (for Table 1)**

- 1) The count of unpaid toll transactions assessed a civil penalty during the reporting period.
- 2) Number of customer accounts that were assessed a civil penalty after being notified of a pending civil penalty assessment within the next 10 days.
- 3) Count of civil penalty transactions related to customer accounts in Item 2 above.
- 4) Count of civil penalty transactions where the customer paid within the period to request an administrative hearing (20 days from mailing date of NOCP summary).
- 5) Number of administrative hearings requested in writing instead of appearing in person.
- 6) Count of civil penalty transactions associated with written hearing requests.
- 7) Number of administrative hearings requested in person as opposed to a hearing through written correspondence.
- 8) Count of civil penalty transactions associated with in-person hearing requests.
- 9) Count of civil penalty transactions with no response during period to request an administrative hearing (20 days from mailing of NOCP summary).
- 10) Number of administrative hearings (both in person and in writing) during the reporting period.
- 11) Count of civil penalty transactions associated with administrative hearing requests during the reporting period.
- 12) Count of customer contacts related to the customer relief programs. This includes both the Customer Program for Resolution (CPR) and the civil penalty mitigation program (components of SSB 5481 – Customer Service Reform)
- 13) Count of civil penalty transaction for which the civil penalty and other associated fees were waived.
- 14) The dollar value of the civil penalties and fees which were waived (Item 13).
- 15) The civil penalty revenue that is reported on the AFS Quarterly Financial Statements.
- 16) The dollar value of the tolls portion of the civil penalty transactions which were collected during the reporting period. The amount may include cash recognized as revenue in previous quarters.
- 17) The dollar value of the civil penalties and fees portion of the civil penalty transactions which were collected during the reporting period. The amount may include cash recognized as revenue in previous quarters.
- 18) Sum of tolls, civil penalties and fees collected related to civil penalty transactions which were collected during the reporting period (sum of note 17 and note 18). The amount may include cash recognized as revenue in previous quarters.
- 19) Expenditures related to debt collection activities for the reporting period. Expenditures include; WSDOT staff, consultant support, credit card fees, NOCP summary postage and mailing costs, and administrative hearing costs such as OAH (hearing officers) and courtroom security (security officers).
- 20) Net cash is the difference between the total amount of tolls, civil penalties and fees (note 18) and civil penalty expenditures (note 19)

## 2. Customer Service Center Procurement

This report is for the period April 1, 2020 through June 30, 2020 and addresses requirements in Section 209 (6) of ESHB 1160 regarding the completion of the procurement and implementation process for the new toll back office system (BOS) and customer service vendors. This report addresses the overall progress toward procuring a new tolling customer service center, the new BOS implementation and the department's effort to mitigate risk to the State.

### Overall Progress

Continuing the work to date, the Toll Division performed the following work in FY 2020 Q4:

Overall, the BOS vendor continues to make positive progress, but velocity continues to be a challenge in completing key deliverables and testing sequences. Key progress included completing the first half of the Operations Test, as well as completing the majority of the train-the-trainer training. In order to complete the second half of the Operations Test, which includes Ad-Hoc testing by WSDOT and AECOM staff, the vendor will now focus on a series of pre-requisites as entry criteria.

BOS Implementation Project Activity: During FY 2020 Q4, WSDOT continued work as follows:

- Continued Milestone 3 final design progress
  - Development efforts are substantially complete and are in defect resolution.
  - Reviewed and returned several chapters of the final System Design Development Deliverables (SDDD) volumes, the final deliverable of Milestone 3. Awaiting final review of the balance of the chapters for the SDDD.
- Continued progress on remaining concurrent Milestones
  - Milestone 5 – Testing/Migration
    - Factory Acceptance Testing (FAT) - Complete, however, the final report lacked necessary test evidence and retesting of more than 400 tests is ongoing.
    - Integration & Commissioning Testing (ICT) – Complete.
    - User Acceptance Testing (UAT) sequences and Report - Complete.
    - Disaster Recovery Testing and Report – Complete.
    - Data migration mapping and analysis continues, with continued support from legacy vendor.
  - Milestone 6 – Training
    - Train-the-trainer training of core BOS functionality has begun.
    - Training environment provided to operations staff for exploration and continued training.
- Continued internal and external BOS project lead and status meetings, continuing weekly meetings with vendor and WSDOT executive teams.
- Continued monthly risk assessment and program budget meetings.
- Continued stakeholder engagement with OFM, Legislative Staff, Office of Chief Information Officer (OCIO), Joint Transportation Committee (JTC), Washington State Transportation Commission (WSTC), Department of Licensing (DOL), WSDOT ITD, Toll Steering Committee and Toll Executive Committees.

- Continued OFM and OCIO monthly project meetings. OCIO representatives also participate in monthly Toll Steering Committee meetings that include Independent Verification & Validation (IV&V) and Quality Assurance (QA) oversight. Additional meetings are also held prior to the steering meeting with WSDOT, QA and IVV separately each month to review and respond to current risks to the project.
- Presentations to the Technology Services Board (TSB) on the status of the project and WSDOT's ongoing management strategies.
- Continue to monitor and report on IT pool technology budget, next gate will be achieved around go-live.
- Transition planning continues with coordination between the BOS vendor, CSC operations vendor, legacy vendor and WSDOT. Planning artifacts from the Vendor and WSDOT are substantially complete.

#### Operations Project:

- Due to the decline in revenues resulting from the COVID-19 pandemic, the Gig Harbor walk-in center will remain permanently closed to save costs, and the Lynnwood walk-in center will not be opened. Both facilities will be repurposed by AECOM staff to offset reduced seating capacity at the Renton facility due to social distancing.
- AECOM staff continued support of train-the-trainer training and BOS ad hoc operations testing.
- Notification to AECOM for staffing ramp-up is on hold pending completion of ad hoc testing by ETAN.
- AECOM is developing a COVID-19 positive test result onsite response plan.
- AECOM continues to work with ETAN to close open technology infrastructure items.
- Initiated an amendment to the AECOM contract to adjust to Guaranteed Go Live date.
- WSDOT and the new CSC operations vendor continue to help review BOS test procedures, training materials and other implementation documentation.

## **Implementation Plan and Process**

WSDOT is maintaining ETAN's project schedule and is seeing better adherence as well as forecasting potential issues further in advance. Despite ETAN's continued use of supplemental resources, ETAN's lack of resources in key development and quality assurance teams continues to affect ETAN's ability to adhere to schedule. In June 2020, WSDOT successfully completed the first portion of the Operations Testing, with WSDOT and AECOM staff completing key workflow scenarios on the system. Attention will now turn to preparing the system for the final phase of testing, Part 2 of the Operations Test. As a result of delays by ETAN in both readiness of Part 2 of the operations test as well as readiness for Part 2 of the testing, the Phase 1 schedule was adjusted to a fall 2020 go-live.

The project team continues to meet internally on a weekly basis to plan and execute the remaining work in upcoming milestones while providing review of critical path, and testing artifacts and data migration related activities. WSDOT, ETAN, AECOM continue to identify and balance training needs and upcoming transition elements affecting all staff and vendors. The implementation contract is divided into two phases:

- **Phase 1** includes replacement of existing core functionality as well as new customer account and payment options and a more modern and user-friendly website.

- **Phase 2** includes agency interoperability, data warehouse, collections functionality and increased trip building capability, which are functions delivered outside of the current core functionality.

## Mitigation Measures

The Toll Division has taken steps to mitigate risk to the department and the State. The contract with ETCC, our existing legacy BOS and CSC vendor, currently contracted through August 2020 with discussions to extend through September, which will provide stability and flexibility as the department continues to work with ETAN to implement the BOS and CSC operations. WSDOT continues to closely monitor ETAN from both BOS and CSC operations readiness perspectives. Mitigation has also included project schedule adjustments, overall transition of the schedule maintenance to WSDOT to more directly manage critical path sequences, and contract enforcement. WSDOT will also continue to coordinate and consider recommendations from OCIO, as well as continue presenting to the Technical Services Board presentations on a Monthly basis.

## Next Steps

In FY 2021 Q1, WSDOT will continue to perform work in three primary areas: (1) CSC Operations Project Implementation; (2) Migration and transition support from our legacy vendor, and (3) BOS Project Implementation, as described below.

1. CSC Operations Project Implementation: With the Renton call center and walk-in center (WIC) buildout complete, activities will focus on the following:
  - Update project plan and schedule based on new system go-live date.
  - Continue developing and refining training plans commensurate with BOS activities.
  - Continue closeout of open items to achieve operations readiness.
  - Complete and deliver Operations Management Plan deliverable.
  - Develop first-year operations budget.
  - Develop KPI monitoring and reporting methods.
  - Continue coordination between CSC operations vendor and legacy vendor as needed to address staffing needs or current operations activities.
  - Continue to support BOS testing and road to cutover.
  - Recruit for key staff positions including Workforce Manager, Project Accountant, and Customer service Manager (replacement).
  - Begin staff recruiting and train-the-troops training.
2. Support from Legacy Vendor: Continue working with ETCC as they provide support for the operations transition and data migration activities through go-live.
3. BOS Project Implementation:
  - Continue to complete portions of concurrent milestones. Milestone 3: Final Design, Milestone 5: Installation & Testing, and Milestone 6: Training. These remaining phase one milestones will be ongoing until go-live.
  - Review and approval of key BOS documentation.
    - Continue to measure impact of new resources supporting ETAN.
    - Complete resolution of all high and critical priority defects prior to Operations Test.
    - Complete training materials and manuals in preparation for troop training.
    - Complete security and performance against the overall system and website.
    - Continue administration of the remainder of the operations test.



- Continue active mitigation and decision progression through vendor development and testing sequences.
- Continue data migration planning analysis and mapping from additional data extractions and migrations.
- Continue cross-vendor management, stakeholder engagement and communication outreach.



### 3. Consultant Reporting

#### Legislative Request

As required by Section 209 (4) of ESHB 1160, the following is the report to the Governor and the Transportation Committees of the Legislature on the use of consultants in the toll operations budgets for FY 2020 and FY 2021. The report includes the name of all consultants, the scope of work, the type of contract, timeliness, and deliverables and any new task orders and extensions added to the consulting contracts during the quarter reported.

#### Terms Defined

For the purpose of this report the requested items were interpreted to mean the following:

**Consultant:** a contractor providing personal services to the Toll Division of WSDOT.

**Scope of work:** a general description of the contracted services.

**Type of contract:** contract categorization according to the Washington State Department of Enterprise Services (DES).

**Timeliness:** the status of task activity during the biennium.

**Deliverables:** a list of work products delivered during the biennium.

#### Summary Report, Expenditures

The Toll Division’s 2019-21 Biennium Program B Budget is \$118,402,000. The following is a summary of the Toll Division’s consultant contracts and associated Program B expenditures through the fourth quarter of FY 2020 (fourth quarter of the biennium):

Consultant Name	Contract Number	Title	Current Task Authorization Value	Total Invoiced Through FY 2020 Q4 (2019-2021)	Cumulative Invoiced
Anthro-Tech Inc.	K001036	BOS Web Development Interface Support	\$190,000	\$6,006	\$175,945
CliftonLarsonAllen LLP	K001170	SR 520 Tolling System Financial Statements Audit	\$354,000	\$84,779	\$149,279
Fagan Consulting LLC	OY12212	Tolling Expert Review Panel	\$148,000	\$2,350	\$23,815

Consultant Name	Contract Number	Title	Current Task Authorization Value	Total Invoiced Through FY 2020 Q4 (2019-2021)	Cumulative Invoiced
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Jacobs Engineering Group Inc.	11038CZ	CSC System Design, Development, Implementation, and Management Support	\$4,803,354	\$1,577,221	\$4,611,896
	11038DL	Toll Systems Operation Support	\$771,305	\$40,972	\$40,972
	11038DM	Tolling Data & Reporting Support	\$674,532	\$114,354	\$114,354
	11038DN	6-C Interoperability Support	\$354,963	\$120,410	\$120,410
	11038DR	Toll Division GTC Financial Operations Support	\$42,548	\$36,517	\$36,517
	11038DS	SR 99 Performance Monitoring Post Tolling	\$587,443	\$148,994	\$148,994
	11038DT	Toll Division Program Management Support	\$334,738	\$194,033	\$194,033
	11038DU	Toll Division Customer Service Operations Support	\$498,842	\$209,228	\$209,228
Maul Foster & Alongi Inc	OY12367	Government Relations/Communications Support	\$45,108	\$4,887	\$4,887
Public Consulting Group Inc. ("PCG")	K001080	IT Professional Services for Toll Division Customer Service Center ("CSC") and Back office System ("BOS") Independent Verification and Validation ("IV&V")	\$1,583,983	\$343,500	\$1,344,603
	K001118	IT Professional Services for Toll Division Customer Service Center ("CSC") and Back office System ("BOS") Quality Assurance ("QA")	\$932,300	\$242,802	\$768,986
Stantec Consulting Services Inc.	11392AQ	SR520 Traffic & Revenue Study	\$544,985	\$177,451	\$177,451
	11392AR	I-405 ETL and SR 167 ET: TRFC Updates Traffic & Revenue Study	\$168,347	\$67,396	\$67,396
Stantec Consulting Services Inc.	12321AA	TNB Traffic & Revenue Study FY 2020 & FY 2021	\$101,413	\$28,336	\$28,336
	12321AC	SR520 Traffic & Revenue Study	\$354,389	\$53,460	\$53,460
	12321AD	I-405 ETL & SR 167 ETL TRFC Updates Traffic & Revenue Study	\$101,861	\$8,246	\$8,246
	12321AE	SR 99 Tunnel Traffic & Revenue Study	\$552,349	\$50,484	\$50,484
Transpo Group	OY12302	Downtown Seattle Transit Pathways Performance	\$74,019	\$24,430	\$24,430



WSP USA Inc.	OY12188	Toll Financial Support	\$1,750,000	\$245,449	\$245,449
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## Consultant Detail

### Anthro-Tech, Inc.

**Contract Type:** Personal Service Contract

**Scope Summary:** To support the Back Office System (BOS) online Customer Service Center (CSC).

**Timelines:** 1/16/2018 through 12/31/2021

**Deliverables:** Usability assessment design support and web accessibility review.

Contract	Title	Work Orders	Current Task Authorization Value
K001036	BOS Web Development Interface Support	TF0041, TF0042, TF0043, TF0044, TF0045	\$190,000

### CliftonLarsonAllen, LLP

**Contract Type:** Personal Service Contract

**Scope Summary:** Conduct an independent audit of the SR 520 Tolling System Financial Statements (Washington State System of Eligible Toll Facilities). The audit must be performed with sufficient audit work necessary to express an opinion on the fair presentation of the SR520 Tolling System Financial Statements under Generally Accepted Auditing Standards (GAAS) as established by the Auditing Standards Board of the American Institute of Certified Public Accountants (AICPA).

**Timelines:** 4/15/2018 through 4/14/2024

**Deliverables:** Conduct an entrance meeting with WSDOT, identify critical audit areas and significant provisions of laws and regulations, perform a preliminary overall risk assessment, establish a protocol and timetable for the fieldwork phase of the audit, test controls over certain key cycles, and provide WSDOT with status reports during the course of the audit fieldwork. As in all phases of the audit, the CONTRACTOR will be in communication with WSDOT to determine that all identified issues are resolved in a timely manner. The CONTRACTOR will also hold a final exit conference with WSDOT to summarize the results of the fieldwork and review significant findings. The CONTRACTOR will provide an Independent Auditors' Report and Management Letter, and also make a formal presentation of the results of the audit to those charged with governance of the WSDOT, if requested.

Contract Number	Title	Work Orders	Current Task Authorization Value
K001170	SR 520 Tolling System Financial Statements Audit	TF0009	\$354,000

### Fagan Consulting, LLC

**Contract Type:** Personal Service Contract

**Scope Summary:** FAGAN CONSULTING (CONSULTANT) has been directed by the DIRECTOR OF TOLLING to convene an Expert Review Panel (ERP) to assist WSDOT (STATE) by providing independent industry review,



advice and feedback as requested on any toll business practice, with a near term focus on implementing new back office and customer service vendor contracts at the end of the current vendor's contract term. To the extent possible it is desired to maintain continuity with the previous Toll Division Expert Review Panel to take maximum advantage of knowledge and history gained through experience with the WSDOT toll program.

**Timelines:** 9/4/2018 through 6/30/2022

**Deliverables:** Provide agendas, meeting notes, evaluation and options memos, document review memos, and monthly progress reports.

Contract Number	Title	Work Orders	Current Task Authorization Value
0Y12212	Tolling Expert Review Panel	TF0008	\$148,000

### Jacobs Engineering Group, Inc.

**Contract Type:** Personal Service Contract

**Scope Summary:** A broad spectrum of management and technical services via an integrated toll management team, including a co-located staff, as well as offsite services as needed.

**Timelines:** 7/01/2010 through 6/30/2021

**Deliverables:** Primary focus is to provide core resource staff for technical, policy, and operations support to the Toll Division. Deliverables as requested by the State.

Contract Number	Title	Work Orders	Current Task Authorization Value
11038CZ	CSC System Design, Development, Implementation, and Management Support	TF0041, TF0042, TF0043, TF0044, TF0045	\$4,803,354
11038DL	Toll Systems Operation Support	TF0006, TF0007, TF0009, TF0014, TF0019	\$771,305
11038DM	Tolling Data & Reporting Support	TF0006, TF0007, TF0009, TF0014, TF0019	\$674,532
11038DN	6-C Interoperability Support	TF0006, TF0007, TF0009, TF0014, TF0019	\$354,963
11038DR	Toll Division GTC Financial Operations Support	TF0006, TF0007, TF0009, TF0014, TF0019	\$42,548
11038DS	SR 99 Performance Monitoring Post Tolling	TF0019	\$587,443
11038DT	Toll Division Program Management Support	TF0006, TF0007, TF0009, TF0014, TF0019	\$334,738



11038DU	Toll Division Customer Service Operations Support	TF0006, TF0007, TF0009, TF0014, TF0019	\$498,842
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### Contract Y11038-CZ

**Scope Summary:** Provide project management support subject matter expertise, staff augmentation and consulting support to assist WSDOT in managing the BOS Vendor's delivery of the implementation of the new CSC BOS solution.

**Timelines:** 7/1/2017 through 8/31/2020

**Deliverables:** Task management, coordination, project administration, WA state Office of Chief Information Officer (OCIO) and Office of Financial Management (OFM) coordination, OFM/OCIO documentation, OFM/OCIO coordination, expert review panel coordination, customer services center back office system (BOS) implementation support and vendor oversight, state project manager support, subject matter system development and implementation oversight, pre-initiation support, preliminary and final design support, data migration and transition support & oversight, procurement support, installation and testing support, training support, production cut-over and Phase I acceptance support, Phase I and final system acceptance, state testing support, BOS/CSC operator coordination.

### Contract Y11038-DL

**Scope Summary:** The CONSULTANT will provide on-going toll program management and operations support that includes a range of tasks for day-to-day management for the new Back Office System (BOS) Operations. The CONSULTANT shall provide ongoing support and expertise as part of the integrated toll management team. This scope of work is related to BOS functionality, which has been accepted by the STATE and is in operations or is part of STATE-approved BOS enhancements.

**Timelines:** 7/1/2019 through 6/30/2021

**Deliverables:** Emerging Issues tracker, Business Analysis Report, review and comments on functional requirement and design documentation related to planned BOS enhancements, change order support, comments on failover and disaster recovery test, comments on vendor submittals and vendor submittal approval letters.

### Contract Y11038-DM

**Scope Summary:** Provide ongoing support and expertise related to data analysis and report development of the various tolling systems (including the new back office systems).

**Timelines:** 7/1/2019 through 6/30/2021

**Deliverables:** Toll Business Report, RITE System Routine Report, Risk Register with Mitigation Strategies and other ad-hoc reports as needed; data quality issues, root cause analysis review and lean documentation, data quality activity summary; operating dashboard, white paper on transition to the cloud; review and comments on BOS vendor Data Dictionary, data model and data flow diagram, monthly and quarterly routine reports, and other ad-hoc reports and data queries during Phase 1 and Phase 2; data warehouse documentation reviews, data warehouse operations and maintenance plans reviews and comments, data warehouse data migration and testing plans reviews and comments, comments on data migration test results, and Risk Register w/Mitigation Strategies.

### Contract Y11038-DN

**Scope Summary:** Work with the State to plan for regional and national interoperability. The CONSULTANT shall work with the STATE to adopt the 6C protocol nationwide.

**Timelines:** 7/1/2019 through 6/30/2021



**Deliverables:** Interoperability strategy options white paper, draft and final specifications for toll system changes, draft and final comments on design, development and testing documents, draft and final results of interoperability verification testing, comments on NIOP business rules and ICDs, draft and final documents for interoperability, interagency meeting agendas, notes and action items, draft and final comments on regulatory updates, user agreements and other legal requirements; Western Region meeting agendas, notes and action items, draft and final Transition Plan documents, draft updates to WRTO technical documentation, comment on Western Regional MOU and technical documents; 6C Coalition quarterly and ad-hoc technical meeting agendas, notes, and action items, participation in 6C meetings, draft and final comments on 6C development and testing documents, draft and final comments on CTOC 6C specification and testing documents; draft and final technical papers evaluating selected emerging technologies, technology meeting agendas, notes, and action items, draft and final Feasibility Analyses, Comments on transponder procurement documents and functionality evaluation.

### **Contract Y11038-DR**

**Scope Summary:** Provide a broad spectrum of management support for financial operations as part of the integrated toll management team.

**Timelines:** 10/15/2019 through 6/30/2021

**Deliverables:** Draft and final Toll Cost of Collection report, final Cost of Collection model, and Toll Cost of Collection Presentation file.

### **Contract Y11038-DS**

**Scope Summary:** Provide support for the SR 99 traffic performance monitoring data collection, analysis, and reporting program as part of the integrated toll management team.

**Timelines:** 11/09/2019 through 3/31/2021

**Deliverables:** Monitoring Plan Change log, Updated SR 99 Corridor Performance Monitoring Plan, data collection, daily and weekly Go Live reports, and final performance reports.

### **Contract Y11038-DT**

**Scope Summary:** Provides Program Management support and expertise as part of the integrated toll management team.

**Timelines:** 7/1/2019 through 6/30/2021

**Deliverables:** General Toll Consultant weekly budget tracker, task order status tracking reports and up to (2) technical memorandums as requested.

### **Contract Y11038-DU**

**Scope Summary:** Provide a broad spectrum of management and operations support that includes a range of tasks for day-to-day management support for Customer Service Operations.

**Timelines:** 7/1/2019 through 6/30/2021

**Deliverables:** Technical memoranda and plans as required, draft and final training plan and materials; draft and final operational and monitoring tolls and reports training plan and materials.



## Maul Foster & Alongi Inc

**Contract Type:** Personal Service Contract

**Scope Summary:** Provides government relations/strategic communications support for the Toll Division.

**Timelines:** 01/7/2020 through 9/30/2020

**Deliverables:** Bill Analysis Report for identified legislation, legislation report(s), Government Relations Strategies Report and develop review and assist with implementation of communication and outreach plans and strategies related to Toll Division initiatives.

Contract Number	Title	Work Orders	Current Task Authorization Value
0Y12367	Government Relations/Communications Support	TF0006, TF0007, TF0009, TF0014, TF0019	\$45,108

## Public Consulting Group (“PCG”)

**Contract Type:** Personal Service Contract

**Scope Summary:** IT Professional Services for Toll Division Customer Service Center (“CSC”) and Back office System including Independent Verification and Validation (“IV&V”) and Quality Assurance (“QA”).

**Timelines:** 10/10/2016 through 8/31/2020

**Deliverables:** Review of BOS applicable vendor deliverables and WSDOT applicable Work Products; provide independent bi-weekly status reports.

Contract Number	Title	Work Orders	Current Task Authorization Value
K001080	IT Professional Services for Toll Division Customer Service Center (“CSC”) and Back office System (“BOS”) Independent Verification and Validation (“IV&V”)	TF0041, TF0042, TF0043, TF0044, TF0045	\$1,583,983
K001118	IT Professional Services for Toll Division Customer Service Center (“CSC”) and Back office System (“BOS”) Quality Assurance (“QA”)	TF0041, TF0042, TF0043, TF0044, TF0045	\$932,300

## Contract K1080

**Scope Summary:** Develop a detailed schedule of all IV&V activities based upon the WSDOT project schedule. PCG will perform a review of agreed upon project artifacts anticipating under the pre-implementation planning and procurement phase of the CSC BOS system integrator. Work collaboratively with the WSDOT project team to provide expert advice that will contribute to the overall success of the project. Provide



independent bi-weekly status reports that are reflection of best practices, industry standards, and the knowledge and experience of the team.

**Timeliness:** 10/10/2016 through 8/31/2020

**Deliverables:** Monthly briefings, status reports, prepare and submit a work plan, assess and recommend improvements as needed to assure executive stakeholder support, verify Project Management Plan is being followed, review and evaluate ongoing project document artifacts, review and make recommendations on the procurement process, and review the technical proposal and work plan of apparent selected CSC BOS vendor in preparation for contract negotiations.

### Contract K1118

**Scope Summary:** Develop a detailed schedule of all QA activities based upon the WSDOT project schedule. PCG will perform a read for information (FYI) or review and provide input of agreed upon project artifacts anticipating under the pre-implementation planning phase of the CSC BOS vendor. Work collaboratively with the WSDOT project team to provide expert advice that will contribute to the overall success of the project. Provide independent bi-weekly status reports that are reflection of best practices, industry standards, and the knowledge and experience of the team.

**Timeliness:** 4/10/2017 through 8/30/2020

**Deliverables:** Participate in Project Management meetings, create the QA plan, review the investment plan, conduct QA reviews and create written report status of the project readiness assessment, address risk areas that can affect or delay the project, review project change requests, continuously update the Quality Records Library, and on-going/regular assessment of project plan, schedule, project status reporting, and execution of project management plan.

### Stantec Consulting Services, Inc.

**Contract Type:** Personal Service Contract

**Scope Summary:** Primary focus is to provide core resource staff for traffic and revenue forecasting and analytical support of the Toll Division. Ongoing work under this agreement will be transferred to Y12321 for completion.

**Timelines:** 7/1/2019 through 11/30/2019

**Deliverables:** Deliverables as requested by the state. Examples include traffic forecasting, impact analyses, revenue projections, and feasibility studies.

Contract Number	Title	Work Orders	Current Task Authorization Value
11392AQ	SR520 Traffic & Revenue Study	TF0009	\$544,985
11392AR	I-405 and SR 167 Traffic & Revenue Study	TF0006, TF0014	\$168,347

### Contract Y11392-AQ

**Scope Summary:** Develop a traffic and gross revenue potential forecast to support ongoing SR 520 traffic and revenue study needs after the final SR 520 bond sale. Those needs include but are not limited to: annual traffic and revenue forecast updates; analyses to support toll rate setting processes or toll policy discussions; on-going performance tracking and reporting between actuals and forecast, and other traffic and revenue analysis requested by the STATE.

**Timelines:** 7/1/2019 through 11/30/2019



**Deliverables:** Outline, schedule, agenda and meeting notes; socio-economic assumptions tables for population, households, and employment; annual traffic and gross toll revenue potential tables by vehicle type by payment method through FY 2056 and monthly for the first 24 months; technical memorandum summarizing the assumptions and methodology for the annual traffic and revenue forecast; traffic and revenue Consultant Certificate; traffic and revenue forecasts for up to (4) additional toll rate alternatives for each fiscal year; documentation to address the root causes of the net revenue shortfalls, recommendations letter describing how to increase toll revenue in the following fiscal year to the level meeting the requirements under the SR 520 Master Bond Resolution; documentation for the monthly traffic and revenue tracking reports and periodic summaries of the Study and comparison of performance versus forecast.

### Contract Y11392-AR

**Scope Summary:** Provide annual Traffic & Revenue forecasts updates for the I-405 Express Toll Lanes (ETLs) and SR 167 Express Toll Lanes (ETLs) corridor to support the state Transportation Revenue Forecast required under RCW 43.88.020.

**Timelines:** 7/1/2019 through 11/30/2019

**Deliverables:** Outline, schedule, agenda and meeting notes; annual traffic and gross toll revenue potential tables by vehicle type by payment method through FY 2031 and monthly for the first 24 months; additional forecast to incorporate rate change decisions by Transportation Commission; descriptions of forecast assumptions and assumptions tables and forecast results for TRFC Assumption and Summary documents; technical memorandum summarizing the methodology for the traffic and revenue forecast that include answers to the forecast related questions; periodic summary of the I-405 ETLs and compare performance versus forecast, if requested.

### Stantec Consulting Services, Inc.

**Contract Type:** Personal Service Contract

**Scope Summary:** Primary focus is to provide core resource staff for traffic and revenue forecasting and analytical support of the Toll Division. This agreement replaces work ongoing under Y11392.

**Timelines:** 9/25/2019 through 6/30/2021

**Deliverables:** Deliverables as requested by the state. Examples include traffic forecasting, impact analyses, revenue projections, and feasibility studies.

Contract Number	Title	Work Orders	Current Task Authorization Value
12321AA	Tacoma Narrows Bridge Traffic & Revenue Study, FY 2020 and FY 2021	TF0007	\$101,413
12321AC	SR520 Traffic & Revenue Study	TF0009	\$354,389
12321AD	I-405 ETL and SR 167 ETL TRFC Updates Traffic & Revenue Study	TF0006, TF0014	\$101,861
12321AE	SR 99 Tunnel Traffic & Revenue Study	TF0019	\$552,349

### Contract Y12321-AA

**Scope Summary:** Provide periodic traffic and gross revenue forecast updates for the Tacoma Narrows Bridge (TNB) to support the state Transportation Revenue Forecast required under RCW 43.88.020. Those needs



include but are not limited to: annual traffic and revenue forecast updates and the annual review of the TNB toll rate sufficiency for the Transportation Commission.

**Timelines:** 10/1/2019 through 6/30/2021

**Deliverables:** Historical toll transaction data, toll rate information, and traffic data for the TNB before tolling was implemented; annual traffic, gross toll revenue potential, and gross toll revenue adjusted tables; forecast to incorporate rate change decisions; technical memorandum; periodic summary of the TNB and comparison of performance versus forecast; traffic and revenue forecasts for additional toll rate alternatives during FY 2021 and other traffic and revenue analysis as requested by the State.

### Contract Y12321-AC

**Scope Summary:** Develop a traffic and gross revenue potential forecast to support ongoing SR 520 traffic and revenue study needs after the final SR 520 bond sale. Those needs include but are not limited to: annual traffic and revenue forecast updates; analyses to support toll rate setting processes or toll policy discussions; on-going performance tracking and reporting between actuals and forecast, and other traffic and revenue analysis requested by the State.

**Timelines:** 12/1/2019 through 6/30/2021

**Deliverables:** Outline, schedule, agenda and meeting notes; socio-economic assumptions tables for population, households, and employment; annual traffic and gross toll revenue potential tables by vehicle type and by payment method through FY 2056 and monthly for the first 24 months; technical memorandum summarizing the assumptions and methodology for the annual traffic and revenue forecast; traffic and revenue Consultant Certificate; traffic and revenue forecasts for up to (4) additional toll rate alternatives for each fiscal year; documentation to address the root causes of the net revenue shortfalls, recommendations letter describing how to increase toll revenue in the following fiscal year to the level meeting the requirements under the SR 520 Master Bond Resolution; documentation for the monthly traffic and revenue tracking reports and periodic summaries of the Study and comparison of performance versus forecast.

### Contract Y12321-AD

**Scope Summary:** Provide annual Traffic & Revenue forecasts updates for the I-405 Express Toll Lanes (ETLs) and SR 167 Express Toll Lanes (ETLs) corridor to support the state Transportation Revenue Forecast required under RCW 43.88.020.

**Timelines:** 12/1/2019 through 6/30/2021

**Deliverables:** Outline, schedule, agenda and meeting notes; annual traffic and gross toll revenue potential tables by vehicle type by payment method through FY 2031 and monthly for the first 24 months; additional forecast to incorporate rate change decisions by Transportation Commission; descriptions of forecast assumptions and assumptions tables and forecast results for TRFC Assumption and Summary documents; technical memorandum summarizing the methodology for the traffic and revenue forecast that include answers to the forecast related questions; periodic summary of the I-405 ETLs and compare performance versus forecast, if requested.

### Contract Y12321-AE

**Scope Summary:** Provide periodic traffic and revenue forecast updates for the SR 99 Tunnel to support the state Transportation Revenue Forecast required under RCW 43.88.020.

**Timelines:** 11/9/2019 through 6/30/2021

**Deliverables:** Outline, schedule, agenda and meeting notes; historical: traffic volumes, speeds, travel times, and origin-destination patterns, toll transaction data, revenue data, toll rate information and traffic data for the SR 99 Tunnel before tolling was implemented; socio-economic assumptions table for population, households and employment; traffic and gross toll revenue potential tables for each forecast update by



vehicle type and by payment method through FY 2059; technical memoranda; monthly summary of the SR 99 Tunnel with comparison of performance versus forecast; traffic and revenue forecasts for additional toll rate alternatives during FY 2021.

### WSP USA, Inc.

**Contract Type:** Personal Service Contract

**Scope Summary:** Prepare updated SR 520 and SR 99 Annual Net Revenue Forecast, provide SR 520 and SR 99 Toll Policy/Rate Setting support, and provide on-going financial planning and analysis support for SR 520, I-405 and SR 99 upon toll commencement (additional facilitates may be added as needed).

**Timelines:** 7/18/2018 through 6/30/2021

**Deliverables:** SR 520 and SR 99 Toll Collection O&M and R&R cost memorandum, combined Facility Cost Tech Memorandum, revenue adjustment forecasts, net revenue projections, toll policy and financial planning support and documentation. Update monthly T&R tables, assist on tolled facilities financial plans, including by not limited to for SR 520, I-405 and SR 99 upon toll commencement, and provide meeting notes (if needed), presentation materials, charts and/or tables.

Contract Number	Title	Work Orders	Current Task Authorization Value
OY12188	Toll Financial Support	TF0009, TF0014	\$1,750,000



## 4. Vendor and Non-Vendor Expenditures

### Legislative Request

As required by Section 209 (4) of ESHB 1160, the following is the quarterly report to the Governor and the Transportation Committees of the Legislature on the non-vendor costs of administering toll operations. This includes the costs of staffing the division, consultants and other personal service contracts required for technical oversight and management assistance, insurance, payments related to credit card processing, transponder purchases and inventory management, facility operations and maintenance, and other miscellaneous non-vendor costs and the vendor-related costs of operating tolled facilities. In addition, it includes the costs of the customer service center, cash collections on the Tacoma Narrows Bridge, electronic payment processing, toll collection equipment maintenance, renewal, and replacement.

<b>Non-Vendor Expenditures<sup>1</sup></b>	<b>FY 2020 Q1</b>	<b>FY 2020 Q2</b>	<b>FY 2020 Q3</b>	<b>FY 2020 Q4</b>	<b>FY 2020 to Date</b>	<b>Biennia to Date</b>
WSDOT Staff	\$ 1,277,977	\$ 1,152,264	\$ 1,459,822	\$ 1,363,741	\$ 5,253,804	\$ 5,253,804
Consultants	\$ 805,879	\$ 991,747	\$ 1,091,207	\$ 996,992	\$ 3,885,826	\$ 3,885,826
Bridge Insurance	\$ 4,550,508	\$ 20,636	\$ 20,636	\$ 20,636	\$ 4,612,416	\$ 4,612,416
Credit Card and Bank Fees	\$ 1,222,746	\$ 1,223,241	\$ 1,232,414	\$ 543,961	\$ 4,222,361	\$ 4,222,361
Transponder Costs	\$ 318,606	\$ 502,275	\$ 343,831	\$ 136,978	\$ 1,301,691	\$ 1,301,691
Pay by Mail	\$ 278,328	\$ 1,088,900	\$ 694,549	\$ 483,445	\$ 2,545,222	\$ 2,545,222
Washington State Patrol	\$ 282,213	\$ 266,602	\$ 222,703	\$ -	\$ 771,519	\$ 771,519
Other Miscellaneous Non-Vendor Expenditures <sup>2</sup>	\$ 686,831	\$ 983,488	\$ 567,760	\$ 462,833	\$ 2,700,912	\$ 2,700,912
<b>Quarterly Non-Vendor Expenditures</b>	<b>\$ 9,423,088</b>	<b>\$ 6,229,153</b>	<b>\$ 5,632,922</b>	<b>\$ 4,008,586</b>	<b>\$ 25,293,749</b>	<b>\$ 25,293,749</b>
<b>Vendor Expenditures<sup>3</sup></b>	<b>FY 2020 Q1</b>	<b>FY 2020 Q2</b>	<b>FY 2020 Q3</b>	<b>FY 2020 Q4</b>	<b>FY 2020 to Date</b>	<b>Biennia to Date</b>
CSC Vendor <sup>4</sup>	\$ 6,585,505	\$ 6,110,751	\$ 6,390,762	\$ 6,491,870	\$ 25,578,887	\$ 25,578,887
Cash Collections (SR-16 Tacoma Narrows Bridge)	\$ 865,560	\$ 870,756	\$ 877,102	\$ 866,004	\$ 3,479,422	\$ 3,479,422
Electronic Payment Processing (SR-16 Tacoma Narrows Bridge) <sup>5</sup>	\$ 18,331	\$ 16,355	\$ 14,223	\$ 13,459	\$ 62,368	\$ 62,368
Toll Collection System Operations and Maintenance <sup>6</sup>	\$ 386,030	\$ 394,176	\$ 394,176	\$ 698,684	\$ 1,873,066	\$ 1,873,066
Office of Administrative Hearings	\$ 15,370	\$ 22,291	\$ 20,294	\$ 30,281	\$ 88,235	\$ 88,235
Other Miscellaneous Vendor Expenditures <sup>7</sup>	\$ 12,650	\$ 17,438	\$ 15,556	\$ -	\$ 45,644	\$ 45,644
<b>Quarterly Vendor Expenditures</b>	<b>\$ 7,883,445</b>	<b>\$ 7,431,767</b>	<b>\$ 7,712,113</b>	<b>\$ 8,100,297</b>	<b>\$ 31,127,623</b>	<b>\$ 31,127,623</b>
<b>Combined Quarterly Expenditures</b>	<b>\$ 17,306,533</b>	<b>\$ 13,660,920</b>	<b>\$ 13,345,036</b>	<b>\$ 12,108,884</b>	<b>\$ 56,421,372</b>	<b>\$ 56,421,372</b>
<b>Notes:</b>						
1) Non-vendor expenditures include both regular toll operations and civil penalty program expenditures.						
2) Other Non-vendor expenditures includes; misc. CSC letters, out of state lookups, NOCP mailings, rent, supplies/materials, computers, telephones, data, and TEF charges.						
3) Vendor expenditures include vendors who support both regular toll collection and civil penalty programs.						
4) CSC Vendor includes vendors who support CSC systems and operations (ETCC, AECOM and ETAN).						
5) Electronic payment processing are expenditures related to credit card payments at the SR16 TNB toll booths.						
6) Toll Collection System Operations and Maintenance includes RTS Vendor expenditures.						
7) Other vendor expenditures includes guards at the Gig Harbor Walk-In-Center (WIC) provided by Phoenix Security.						

### Notable (in comparison with FY20 Q3)

- Credit Card and Bank Fees decreased in the 4<sup>th</sup> quarter due to post-COVID reduced tolling transactions.
- Transponder Costs were lower due to post-COVID decreased transponder purchases by *Good To Go!* customers.
- Pay by Mail Processing and Other Miscellaneous Non-Vendor costs decreased due to reduced tolling transactions.
- Washington State Patrol decreased due to enforcement being stopped in mid-March post-COVID.
- Toll Collection System Operations and Maintenance increased due to payments of the annual SOC-1 audit and yearly accrual of the performance audits for SR167, SR520, and I-405.
- Office of Administrative Hearings increased due to higher customer requests for hearings.

Other Miscellaneous Vendor Expenditures, which is Phoenix Security, decreased due to closure of the Gig Harbor walk-in-centers (WIC), no longer requiring security services.