



November 17, 2023

Automobile Inspection and Readjustment Program – Status Report

Members of the Legislative Audit Committee:

Attached is the status report from the Department of Public Health & Environment (Department) on the implementation of recommendations contained in the Office of the State Auditor's (OSA) *Automobile Inspection and Readjustment Program Performance Audit*.

OSA Review of Documentation

As part of the status report process, we requested and received supporting documentation for each recommendation that the Department reported as having been implemented. Specifically, we reviewed the following documentation:

- A timeline outlining when the Department reversed the changes that it had made to vehicle testing due to the COVID-19 pandemic.
- A Department memo outlining the work it has completed to date and the work it plans to complete by January 2024 for Recommendation 2.

Based on our review, the supporting documentation substantiates the Department's reported implementation status.



COLORADO

Air Pollution Control Division

Department of Public Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

August 31, 2023

Kerri L. Hunter, CPA
State Auditor
Colorado Office of the State Auditor
1525 Sherman St., 7th Floor
Denver, CO 80203

Dear Auditor Hunter:

In response to your request, we have prepared the attached status report on the implementation status of audit recommendations contained in the Automobile Inspection and Readjustment Program. The report provides a brief explanation of the actions taken by the Department of Public Health & Environment to implement each recommendation.

The Department has successfully implemented recommendations 1a and 1b. These recommendations focused on restoring the vehicle emissions testing procedures that were modified multiple times because of the pandemic to accommodate motorist safety and inconvenience.

The Department continues to work on recommendation 2, which is analysis to determine if there would be emissions reductions in the Denver Metro/North Front Range areas if the AIR Program was expanded into El Paso county. This analysis is ongoing and the Department is still in the process of collecting 2023 data from the necessary emissions monitors. The Department is still on track to comply with the January 31, 2024 implementation date.

If you have any questions about this status report and the Department of Public Health & Environment's efforts to implement the audit recommendations, please contact Trisha Oeth at Trisha.Oeth@state.co.us.

Sincerely,

Trisha Oeth
Director of Environmental Health and Protection



Audit Recommendation Status Report

Audit Name:	Automobile Inspection and Readjustment Program
Audit Number:	2173P
Agency:	Department of Public Health & Environment
Date of Status Report:	September 5, 2023

Section I: Summary				
Rec. Number	Response from Audit Report	Original Implementation Date	Current Implementation Status	Current Implementation Date
1	Agree	March 31, 2023	Implemented	June 1, 2022
1b	Agree	March 31, 2023	Implemented	June 1, 2022
2	Agree	January 31, 2024	Partially Implemented	January 31, 2024

Section II: Narrative Detail

Recommendation 1a

The Colorado Department of Public Health and Environment (Department) should consider the following modifications with respect to the Automobile Inspection and Readjustment Program (AIR Program): The AIR program should impose pre-pandemic testing standards including:

- i. Exempting the newest 7 model years from Air program test requirements.
- ii. Performing IM240 tests on 1982 and newer model year vehicles up to 12 model years old.
- iii. Performing OBD tests on 8-11-year-old vehicles. If these vehicles do not meet OBD readiness requirements, but pass all other OBD pass/fail criteria, they should receive IM240 tests.

Current Implementation Status	Implemented
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Current Implementation Date	June 1, 2022
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Status Update Narrative	During the pandemic, the Department made numerous changes to testing requirements as the pandemic evolved. On June 1, 2022, the Department implemented pre-pandemic testing with the intention of changing back to pandemic testing in late 2022/early 2023 depending on the severity of the pandemic. The severity of the pandemic declined in the later part of 2022 and the Department did not need to implement the modified testing procedures. Therefore, this recommendation was implemented earlier than expected.
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Recommendation 1b

The Colorado Department of Public Health and Environment (Department) should consider the following modifications with respect to the Automobile Inspection and Readjustment Program (AIR Program): If confirmatory IM240 testing is discontinued for 8 to 11 model-year vehicles that do not meet OBD readiness requirements, the Department should instead require these vehicles to meet the OBD readiness requirements.

Current Implementation Status	Implemented
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Current Implementation Date	June 1, 2022
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Status Update Narrative	During the pandemic, the Department made numerous changes to testing requirements as the pandemic evolved. On June 1, 2022, the Department implemented pre-pandemic IM240 test requirements, as prescribed in Regulation 11, with the intention of changing back to pandemic testing requirements in late 2022/early 2023 depending on the severity of the pandemic. The severity of the pandemic declined in the later part of 2022 and the Department did not need to implement the modified testing procedures. Therefore, this recommendation was implemented earlier than expected.
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Recommendation 2

The Colorado Department of Public Health and Environment (Department) should perform an analysis to determine if the reductions in emissions that would occur in the Denver Metro/North Front Range (DM/NFR) area from expansion of the AIR Program to El Paso County would be a cost-effective strategy to assist in compliance (and maintenance of compliance) with the 2008 and 2015 ozone standards compared to the other control measures that are being considered for implementation in the DM/NFR area. The Department should determine the appropriate next steps based on the results of its analysis.

Current Implementation Status

Partially Implemented

Current Implementation Date

January 31, 2024

Status Update Narrative

The Department is currently performing an analysis to determine if the expansion of the AIR Program into El Paso County would reduce emissions in the Denver Metro/North Front Range (DM/NFR) areas. The Department will finalize the analysis at the conclusion of the 2023 ozone season after receiving emissions monitor data from locations in El Paso County.