COAST PROFESSIONAL, INC.

Coast Professional, Inc. Response to

RFI DOR - 01282020

Nebraska Department of Revenue

Submitted to:

Julie Schiltz
State Purchasing Bureau
1526 K Street
Suite 130
Lincoln, NE 68508
(402) 471-6500
as.materielpurchasing@nebraska.gov

Submitted by:

Diana Day
National Account Executive
Coast Professional, Inc.
4273 Volunteer Road
Geneseo, NY 14454
(585) 667-2906
dday@coastprofessional.com

ORIGIN ID:ROCA (585) 991-5223
ANNE NICHOLS
COAST PROFESSIONAL, INC.
4273 VOLUNTEER ROAD

GENESEO, NY 14454
UNITED STATES US

SHIP DATE: 11MAR20
ACTWGT: 5.00 LB
CAD: 109728497/INET4220

BILL SENDER

TO **JULIE SCHILTZ**
STATE PURCHASING BUREAU
1526 K STREET
SUITE 130
LINCOLN NE 68508
(402) 471-6500 REF:
INV:
PO: DEPT:

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FedEx Express

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PRIORITY OVERNIGHT

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3/11/2020

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COAST
PROFESSIONAL, INC.

Coast Professional, Inc. Mission Statement:

Coast's mission is to perform services by and on behalf of its clients with the highest integrity, efficiency, and in a manner that assures that taxpayers are treated with courtesy and respect. Coast is dedicated to maintaining the highest knowledge in the field of debt recovery, superior customer service, and respectful communication.

Coast maintains a professional corporate environment that encourages teamwork and rewards enthusiasm. The professional goals of Coast's employees are supported and promoted with meaningful training and on the job education, as well as mentoring and coaching from others. Coast continues to build lasting relationships with its clients while providing superior customer service.

COAST
PROFESSIONAL, INC

March 6, 2020

Ms. Julie Schiltz
State Purchasing Bureau
1526 K Street, Suite 130
Lincoln, NE 68508

Dear Ms. Schiltz,

Coast Professional, Inc. (Coast) is pleased to have the opportunity to respond to the RFI DOR-01282020 for the Nebraska Department of Revenue (DOR). We have the personnel, resources, experience, and expertise to deliver both excellent recoveries and world-class customer service to the DOR.

Established in 1976, Coast is a proven expert in the collection of government debt. We currently provide collection services to the Department of the Treasury, Bureau of the Fiscal Service covering 34 different federal government entities, more than 200 colleges and universities across the nation, and the U.S. Department of Education, Federal Student Aid.

Coast has the processes, operations, quality control, technology, security and financial stability to provide proven and professional debt collection services to the Nebraska Department of Revenue. We understand the importance of treating consumers with respect and professionalism, while increasing revenues and decreasing past due accounts for the DOR. Our representatives are experienced in collecting a variety of receivables. They are skilled in the requirements of federal and state regulations applicable to debt collection, are sensitive to the circumstances of consumers, and are attentive to the needs of our clients.

If you have any questions about the services discussed herein, or require additional information about what Coast can do for the DOR, please contact your National Account Executive, Diana Day. She can be reached by phone at (585) 667-2906 or by email at dday@coastprofessional.com.

On behalf of the entire Coast Team, thank you for this opportunity.

Sincerely,

Jonathan Prince
Chief Operating Officer

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SCOPE OF SERVICE

The Nebraska Department of Revenue, ("DOR") is issuing this Request for Information RFI DOR-01282020 for the purpose of gathering information to help DOR determine the necessity and scope, if any, of a potential Request for Proposal in regards to a scalable solution allowing for collections on the delinquent tax accounts for primarily non-resident taxpayers at implementation with the capability of expanding to other accounts types if needed.

Written questions are due no later than February 14, 2020, and should be submitted via e-mail to as.materielpurchasing@nebraska.gov.

Bidder should submit one (1) original of the entire RFI response. RFI responses should be submitted by the RFI due date and time.

Sealed RFI responses should be received in State Purchasing Bureau by the date and time of RFI opening indicated above.

Coast has read, understands, and agrees to comply. Coast has provided a signed copy of the Scope of Service on the following page.

State of Nebraska Department of Revenue (DOR)
REQUEST FOR INFORMATION

RETURN TO:
Name: State Purchasing Bureau
Address: 1526 K Street Ste. 130
City/State/Zip: Lincoln, NE 68508
Phone: 402-471-5600

SOLICITATION NUMBER	RELEASE DATE
RFI DOR-01282020	**January 28, 2020**
OPENING DATE AND TIME	PROCUREMENT CONTACT
March 13, 2020 2:00 p.m. Central Time	**Julie Schiltz**

This form is part of the specification package and must be signed in ink and returned, along with information documents, by the opening date and time specified.

PLEASE READ CAREFULLY!

SCOPE OF SERVICE

The Nebraska Department of Revenue, ("DOR") is issuing this Request for Information RFI DOR-01282020 for the purpose of gathering information to help DOR determine the necessity and scope, if any, of a potential Request for Proposal in regards to a scalable solution allowing for collections on the delinquent tax accounts for primarily non-resident taxpayers at implementation with the capability of expanding to other accounts types if needed.

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Sealed RFI responses should be received in State Purchasing Bureau by the date and time of RFI opening indicated above.

BIDDER MUST COMPLETE THE FOLLOWING

By signing this Request For Information form, the bidder guarantees compliance with the provisions stated in this Request for Information.

FIRM: Coast Professional, Inc.
COMPLETE ADDRESS: 4273 Volunteer Road, Geneseo, NY 14454
TELEPHONE NUMBER: (585) 667-2906 FAX NUMBER: (866) 682-1915
SIGNATURE: _____ DATE: 03/06/2020
TYPED NAME & TITLE OF SIGNER: Jonathan Prince, Chief Operating Officer

I. SCOPE OF THE REQUEST FOR INFORMATION

DOR is issuing this Request for Information, RFI DOR-01282020 for the purpose of gathering information to help DOR determine the necessity and scope, if any, of a potential Request for Proposal in regards to a scalable solution allowing for collections on the delinquent tax accounts for primarily non-resident taxpayers at implementation with the capability of expanding to other accounts types if needed.

ALL INFORMATION PERTINENT TO THIS REQUEST FOR INFORMATION CAN BE FOUND ON THE INTERNET AT: http://das.nebraska.gov/materiel/purchasing.html

A. SCHEDULE OF EVENTS

The State expects to adhere to the tentative procurement schedule shown below. It should be noted, however, that some dates are approximate and subject to change.

	ACTIVITY	DATE/TIME
1	Release Request for Information	1/28/2020
2	Last day to submit written questions	2/14/2020
3	State responds to written questions through Request for Information "Addendum" and/or "Amendment" to be posted to the internet at: http://das.nebraska.gov/materiel/purchasing.html	2/28/2020
4	RFI opening Location: State Purchasing Bureau 1526 K Street, Suite 130 Lincoln, NE 68508	3/13/2020 2:00 PM Central Time
5	Conduct oral interviews/presentations and/or demonstrations (if required)	4/6/2020

Coast has read, understands, and agrees to comply.

II. RFI RESPONSE PROCEDURES

A. OFFICE AND CONTACT PERSON

Responsibilities related to this Request for Information reside with the State Purchasing Bureau. The point of contact for the RFI is as follows:

Name: Julie Schiltz
RFP DOR-01282020
Agency: State Purchasing Bureau
Address: 1526 K Street Ste. 130
Lincoln, NE 68509-4818
Telephone: 402-471-6500
E-Mail: as.materielpurchasing@nebraska.gov

Coast has read and understands.

B. GENERAL INFORMATION

A subsequent Request for Proposal (RFP) may not be issued as a result of this RFI. There will not be a contract as a result of this RFI and the State is not liable for any cost incurred by vendors in replying to this RFI. If an RFP is issued, the information provided will assist the State of Nebraska in developing the Request for Proposal. This RFI does not obligate the State to reply to the RFI responses, to issue an RFP, or to include any RFI provisions or responses provided by vendors in any RFP.

Coast has read and understands.

C. COMMUNICATION WITH STATE STAFF

From the date the Request for Information is issued and until RFI opening (as shown in the Schedule of Events), contact regarding this RFI between potential vendors and individuals employed by the State should be restricted to written communication with the staff designated above as the point of contact for this Request for Information.

The following exceptions to these restrictions are permitted:

1. Written communication with the person(s) designated as the point(s) of contact for this Request for Information;

2. contacts made pursuant to any pre-existing contracts or obligations; and

3. State-requested presentations, key personnel interviews, clarification sessions, or discussions.

Violations of these conditions may be considered sufficient cause to reject a vendor's response to the RFI. No individual member of the State, employee of the State, or member of the Interview Committee is empowered to make binding statements regarding this RFI. The State of Nebraska will issue any clarifications or opinions regarding this RFI in writing.

Coast has read, understands, and agrees to comply.

D. WRITTEN QUESTIONS AND ANSWERS

Any explanation desired by a vendor regarding the meaning or interpretation of any Request for Information provision should be submitted in writing to the DOR and clearly marked "RFI Number DOR-01282020; Scalable Solution allowing for collections on the delinquent tax accounts Questions". It is preferred that questions be sent via e-mail to as.materielpurchasing@nebraska.gov

It is recommended that Bidders submit questions sequentially numbered, include the RFI reference and page number using the following format.

Question Number	RFI Section Reference	RFI Page Number	Question

Written answers will be provided through an addendum to be posted on the Internet at http://das.nebraska.gov/materiel/purchasing.html on or before the date shown in the Schedule of Events.

Coast has read, understands, and has complied.

E. ORAL INTERVIEWS/PRESENTATIONS AND/OR DEMONSTRATIONS

DOR reserves the right to conduct oral interviews/presentations and/or demonstrations if required at the sole invitation of the State.

Any cost incidental to the oral interviews/presentations and/or demonstrations shall be borne entirely by the vendor and will not be compensated by the State

Coast has read, understands, and agrees to comply.

F. SUBMISSION OF RESPONSE

The following describes the requirements related to the RFI submission, handling and review by the State.

To facilitate the response review process, one (1) original of the entire RFI response should be submitted. RFI responses should be submitted by the RFI due date and time.

A separate sheet must be provided that clearly states which sections have been submitted as proprietary or have copyrighted materials. RFI responses should reference the request for information number and be sent to the specified address. Please note that the address label should appear as specified on the face of each container. If a recipient phone number is required for delivery purposes, 402-471-5624 should be used. The Request for Information number must be included in all correspondence.

Coast has read, understands, and agrees to comply.

G. PROPRIETARY INFORMATION

Data contained in the response and all documentation provided therein, become the property of the State of Nebraska and the data become public information upon opening the response. If the vendor wishes to have any information withheld from the public, such information must fall within the definition of proprietary information contained within Nebraska's public record statutes. All proprietary information the vendor wishes the state to withhold must be submitted in a sealed package, which is separate from the remainder of the response. The separate package must be clearly marked PROPRIETARY on the outside of the package. Vendor may not mark their entire Request for Information as proprietary. Failure of the vendor to follow the instructions for submitting proprietary and copyrighted information may result in the information being viewed by other vendors and the public. Proprietary information is defined as trade secrets, academic and scientific research work which is in progress and unpublished, and other information which if released would give advantage to business competitors and serve no public purpose (see Neb. Rev. Stat. § 84-712.05(3)). In accordance with Attorney General Opinions 92068 and 97033, vendors submitting information as proprietary may be required to prove specific, named competitor(s) who would be advantaged by release of the information and the specific advantage the competitor(s) would receive. Although every effort will be made to withhold information that is properly submitted as proprietary and meets the State's definition of proprietary information, the State is under no obligation to maintain the confidentiality of proprietary information and accepts no liability for the release of such information.

Coast has read, understands, and agrees to comply.

H. REQUEST FOR INFORMATION OPENING

The sealed responses will be publicly opened and the responding entities announced on the date, time, and location shown in the Schedule of Events. Responses will be available for viewing by those present after the opening. Vendors may also contact the state to schedule an appointment for viewing RFI responses.

Coast has read, understands, and agrees to comply.

III. PROJECT DESCRIPTION AND SCOPE OF WORK

The vendor should provide the following information in response to this Request for Information.

A. PURPOSE AND BACKGROUND

This RFI is to elicit information and best analysis of knowledgeable persons in the vendor community to enable the Nebraska Department of Revenue (DOR) to craft a potential RFP for the collection of delinquent tax accounts as provided by Nebraska Revised Statutes § 77-377.01 et seq. Responses to this RFI should include information that will be useful to DOR in subsequently drafting more detailed procurement solicitation(s) related to this endeavor.

The Nebraska Department of Revenue (DOR) is responsible for the administration, assessment, and collection of personal income taxes and a variety of business taxes. Business taxes include but are not necessarily limited to sales and use taxes, employer withholding taxes, corporation income taxes, excise taxes and fees.

Coast has read and understands.

B. CURRENT BUSINESS PRACTICES

Currently, delinquent accounts are assigned to DOR agents. The assigned agent issues a letter informing the taxpayer that forced collections activities are to begin if taxpayer fails to address delinquent tax liability. Twenty-one days after the letter is sent, the agent would locate levy sources, if available. The agent then takes action if a levy source is found. If no levy source is found and depending on the size of the balance, a lien would be recorded and then calendared out for a future check for levy sources.

Currently all collections of delinquent taxes are performed by in-house DOR teammates. Nebraska Revised Statutes § 77-377.01 et seq allows for DOR to collect delinquent taxes through a collection agency.

Coast has read and understands the current business practices employed by DOR.

C. SYSTEM OVERVIEW

The current system at DOR is an Oracle based in-house developed collection system called the Automated Collection System (ACS). This system is used to generate documents, project interest, track letters with Taxpayers, and store lien information. DOR is able to provide an electronic file with the information needed to assign collections to a third party provider. DOR will change the assignment to Collection Agency in ACS to denote which accounts will go to and/or have been assigned to the collection agency.

Coast has read and understands the current system process utilized by DOR. We have extensive experience building file exchange processes with client systems. We have an internal IT team of more than 30 employees to complete this work on time and at no additional cost to DOR. More information on our Information Technology team can be found on page 13.

D. SCOPE OF WORK

Scope: DOR is in search of obtaining the best solution available, including potential managed services, for the primary purpose of collecting non-resident individual and business tax obligations due and owing to the state of Nebraska with the capability for expanding to other accounts as needed.

DOR's goal is to have a contract in place on or about March 1, 2021 to begin implementation shortly thereafter. DOR will base the performance of the solution contracted upon the amount of monies collected in comparison to the account value referred along with time taken to collect such monies. DOR will evaluate the performance of the contracted agency(s) at the end of a designated period of the contract to determine any renewal periods.

Coast has read and understands the Scope of Work sought by DOR.

E. CAPABILITIES

Vendor should provide narrative responses to each of the following:

1.1 Describe the solution(s) proposed to enable DOR to better accomplish the collection of delinquent tax accounts as provided by Nebraska Revised Statues § 77-377.01 et seq.

By utilizing professional collection agencies, DOR will enhance its recovery efforts and will have access to years of experience in both skip tracing and the amicable resolution of taxpayer debts. DOR should expect higher returns on delinquent accounts, an expedited recovery process, and a reduced administrative burden of managing delinquent accounts. The agency selected should be able to provide sophisticated skip-tracing resources, proven operational processes, and years of experience in managing government receivables.

Experience

Established in 1976, Coast is a proven expert in the collection of government debt. We have more than 250 years of combined management experience providing collection services to the federal government and state agencies including the U.S. Department of Education, federal government entities, and hundreds of public and private colleges and universities. Coast currently manages 790,000 government accounts valued at more than $19.5 billion for the federal government. These accounts include 230 unique debt types for 35 different government entities.

Coast is proud of its accomplishments:

- Top performing agency for the Department of Treasury, Bureau of the Fiscal Service (Fiscal Service) contract with three (3) first place finishes in four (4) quarters since contract inception in 2018
- Number one PCA on the 2009 United States Department of Education, Federal Student Aid (FSA) Small Business Pool contract
- Current leader on the 2014 FSA contract
- Is a contract agency on the General Services Administration (GSA) Schedule

Coast has the processes, operations, quality control, technology, security, and financial stability to provide proven and professional debt collection services to DOR.

Collection Process

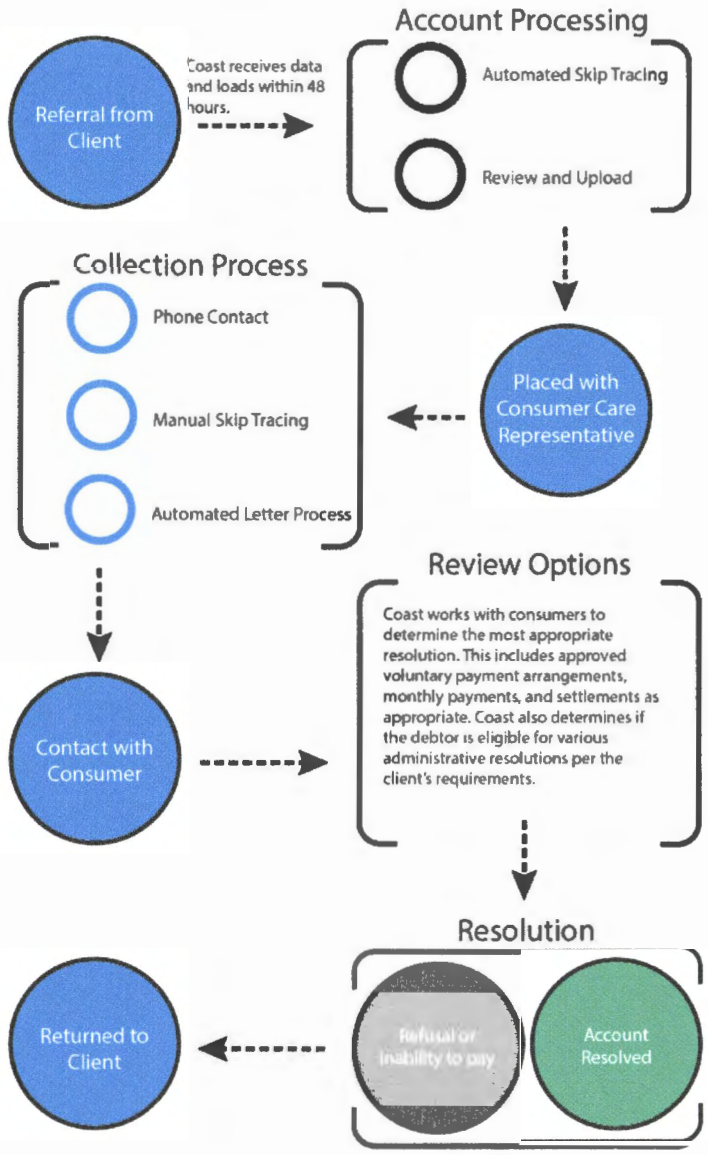
Coast has developed an industry leading collection process which utilizes a combination of mailed correspondence, telephone contact, and cutting-edge skip tracing to effectively communicate with and locate taxpayers. Our collection process includes a combination of systematic workflows and the talent of highly trained staff who are experts in compliant communication with taxpayers. The collection process is in compliance with DOR's requirements as well as with all federal, state and local laws and regulations. Coast has provided an overview of our collection process and the specific procedures for effective taxpayer communication in the pages that follow.

Collection Illustration

To the right is a high level overview of our collection process and the steps that representatives take in order to properly serve taxpayers and provide substantial returns to our clients. This chart is an illustration of the most utilized path of taxpayer resolution.

This process has been developed through decades of experience working hundreds of contracts and can be tailored to meet all requirements as outlined by DOR.

On the following pages, Coast provides in detail our ability to meet DOR's requirements and provide exceptional service to both DOR and its taxpayers.



Skip Tracing Overview

Coast has invested substantial long-term company resources in cutting-edge skip tracing tools for our collection teams; Coast is committed to investing in emerging skip trace technologies to:

- Ensure quality in our services
- Improve our competitive advantage
- Maintain compliance with contractual requirements
- Maintain top performance for our clients
- Meet the changing needs of our industry

These tools give us an edge in locating taxpayers which ultimately translates to more effective collection of DOR's accounts. Our Consumer Care Representatives (CCRs) utilize multiple, state-of-the-art tools, all from their desks. Coast also uses batch processing for skip tracing accounts in large groups when necessary. Account updates will be provided to DOR in the formats requested based on the file layouts provided or Coast standard file layout.

Complete skip tracing will be conducted including:

- Additional client media requested
- Business credit bureau report with permissible purpose
- Compare references, relatives, neighbors, and affiliates review
- Correlate name and address
- Full taxpayer credit bureau report with permissible purpose
- Internet social media and database searches including UCC filings, Manta, Secretary of State search
- Job search using proprietary place of employment locators
- Media research
- Multiple phone numbers including cell phones
- Professional organizations search
- Property search

Documentation

Every activity, including telephone calls and written notices, is documented in the taxpayer's record in Coast's collection system during the course of collection action. Team Managers continuously assess, review, and listen to team calls and monitor activity.

Collection Notices (Letters)

Coast will send the necessary correspondence to taxpayers in compliance with DOR's requirements. Coast also has the ability to generate ad hoc collection notices as required by DOR.

Rigorous Research

After generation of the initial demand notice advising the taxpayer that the debt owed to DOR has been referred to Coast, the account is assigned to a Consumer Care Representative (CCR). The representative will begin telephone efforts to collect based on information provided at placement and updated through our account intake scrubbing process.

If the initial contact is not successful, the CCR will initiate rigorous skip-tracing procedures until the taxpayer is located. Coast believes almost any taxpayer can be located with the right tools and training. Coast is dedicated to giving our staff the best resources available in the marketplace to support efficient and effective debt collection.

Telephone Contact with Taxpayers

All live calls receive notice that the call may be monitored and recorded (per federal, state and local laws and regulations). When communicating with taxpayers, Coast ensures we are speaking with the correct party prior to disclosing any information regarding the existence of debt. This includes confirming two (2) pieces of unique information with the taxpayer (ex. Social Security Number [SSN] or date of birth [DOB] and one other data point, or, in the instance of business accounts, the Federal Employer Identification (FEI) number). Representatives also verify the address and telephone numbers are valid.

Once verification is complete, representatives will recite the Mini Miranda as required (pursuant to the FDCPA) and identify Coast Professional, Inc. (as required by state laws), DOR and the representative's name to provide clear and transparent communication with the taxpayer. Additionally, Coast provides our corporate address to taxpayers in compliance with state laws.

As part of Coast's information verification process, all payment arrangements require a Collection Manager to review and speak with the taxpayer to verify both corporate and client contract compliance.

Payment Arrangements

Payment in Full

Once the taxpayer's identity has been properly confirmed, Coast will attempt to secure a balance in full payment with the taxpayer. Payment in full is in the best interest of all parties as it provides DOR with immediate cash flow, reduces outstanding accounts to manager, and it quickly resolves the financial obligation of the taxpayer.

If the taxpayer is unable to pay the balance in full, our CCR will work to establish a monthly payment schedule that begins with a substantial down payment and complies with DOR's payment requirements. If the taxpayer provides proof that he or she cannot make the down payment, the representative will consult with his or her team manager and together the representative, team manager, and the taxpayer will work to determine payment arrangements that will address both DOR's need to resolve the debt timely and the taxpayer's budgetary constraints.

Repayment Agreements

Repayment agreements require a verified financial statement, which allows Coast to help the taxpayer objectively evaluate their ability to pay. We collaborate with the taxpayer in a caring manner to identify alternate income sources or existing assets that may have been overlooked that will allow them to pay off their debt more quickly.

Partial Repayment Agreements

In the instance that a balance in full payment sum and a Repayment Agreement resulting in the full balance being paid off in a month is not possible for a taxpayer, Coast will look to establish a partial repayment agreement. This will include determining the taxpayer's current financial situation through the use of Coast's financial statement (and State Financial Statement and documentation as applicable). Once we obtain a more detailed understanding of the taxpayer's ability to resolve their obligation, Coast will establish, per the requirements and parameters of DOR, a Partial Repayment Agreement.

1.2 Describe the monitoring process of internal compliance including but not limited to cybersecurity standards and/or certifications to the State and Federal Information Security Laws and industry standards.

Agencies should have an independent Compliance Department to remove the inherent conflict-of-interest when a company's compliance with regulations is the responsibility of the Operations Department. This allows for impartial review of a company's actions to ensure their continued compliance. Coast has provided an overview of our information security and compliance efforts on the following pages.

Security Standards

Coast employs significant information security standards to ensure protection of our systems and the information entrusted to us by our clients. Coast is in compliance with all federal and state requirements pertaining to data security and management of confidential information. This includes:

- Federal Information Security Management Act (FISMA)
- Federal Trade Commission (FTC) Red Flags Rules
- Gramm-Leach-Bliley Act (GLBA)
- Health Insurance Portability and Accountability Act (HIPAA)
- ISO 27002
- Massachusetts Standards for the Protection of Personal Information of Residents of the Commonwealth (Mass CMR 17.00)
- Minnesota Plastic Card Security Act (MN PCA)
- Nevada Personal Information Law (NRS 603a)
- Payment Card Industry – Data Security Standards (PCI-DSS)

As part of Coast's data security and compliance requirements, third-party service provider due diligence is conducted on an annual basis. Part of that evaluation is verifying that all service providers comply with the same standards, laws, and regulations with which Coast maintains compliance.

FISMA Compliant

As a contractor for the Department of Education, Federal Student Aid, Coast is required to obtain an Authority to Operate (ATO), and follow the Federal Information Security Management Act of 2002 (FISMA, 44 U.S.C. § 3541, et seq.), a federal law intended to strengthen information security systems and refine the transmission of electronic data. This law extends beyond the systems managed by the federal government to cover any third party service providers who aid in the management of government data.

FISMA compliance is obtained by an agency submitting to a process in which the company's complete IT structure, equipment and security controls are recorded, assessed, certified and accredited. Once FISMA compliance is achieved, regulations require annual monitoring to maintain accreditation. Although our contractual obligations to the Department of Education was the catalyst for Coast to pursue compliance, all business lines benefit from working with a FISMA compliant agency due to the advanced security practices it requires.

This has allowed Coast to invest and focus on compliance. Through this process, we have created complete security protocols to monitor accounts. Additionally, our IT and compliance staff are the most talented, knowledgeable, and experienced professionals in the industry. Most recently, we hired an ISO with over 15 years of industry experience who holds a Certified Information Systems Security Professional (CISSP) distinction.

IRS Publication 1075

As a federal government contractor, Coast is knowledgeable with the security controls in IRS Publication 1075, Tax Information Security Guidelines for Federal, State, and Local Agencies. This includes the safeguarding of federal tax information, record keeping policies, information storage standards, data access restriction, training, and reporting requirements. Coast is committed to the protection of data provided by clients and taxpayers and has enacted information security standards appropriate for the industry and the data processed.

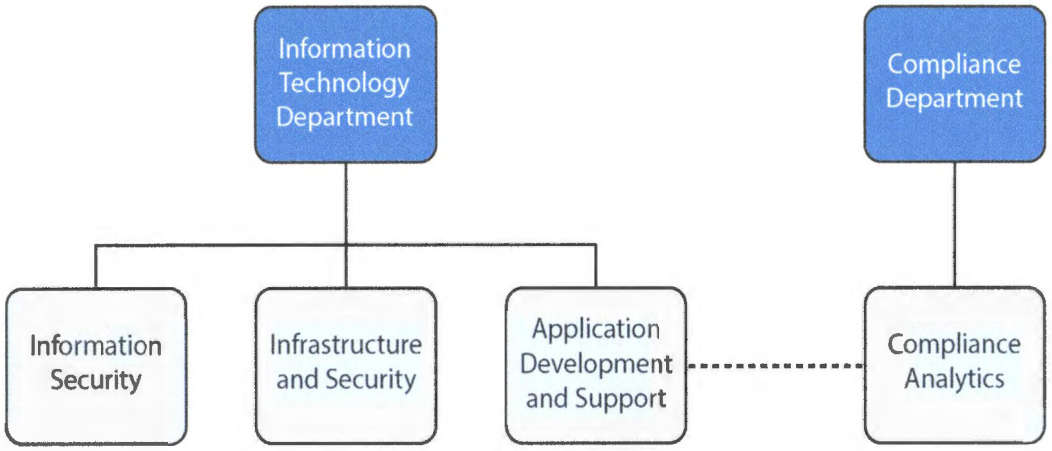
Information Technology Staff

DOR should expect its agencies to maintain in-house IT staff to address daily issues and provide timely and dedicated support to DOR and its staff. Coast has more than 30 staff dedicated to our Information Technology Resources split into three separate verticals:

- **Infrastructure and Security:** The Infrastructure and Security team is responsible for the administration of Coast's information technology assets, networks, and systems: the management and support for the company's advanced network of computers; and the maintenance of the company's IT infrastructure and environment. This team is comprised of help desk support representatives, system engineers, system administrators, and network engineers.
- **Application Development and Support:** Coast has a separate Application Development team that works on the company's collection environment, applications, and data. They are responsible for the management of company, client, and taxpayer data; the completion of system updates; the building of data infrastructure; and the management of company and client reports.
    - Coast has an independent team within the Compliance Department that audits the IT Application Development team against company standards to ensure the review, management, and assessment of the company's data handling practices are followed.

- **Information Security:** Coast has a separate Information Security Team, comprised of an Information Security Officer (ISO), who monitors the company's information security efforts. The responsibility of the Information Security Team is the management of company information security audits; the upkeep of information security documentation including the company's disaster recovery/business continuity plans; the response to perceived or actual threat of potential data security issues; and the prevention, mitigation, and controlling of information security concerns.

IT Department
Organizational Chart



FDCPA Training / Preparation

Coast is committed to compliance with the Fair Debt Collection Practices Act (FDCPA), the Telephone Consumer Protection Act (TCPA), and other applicable laws and regulations governing professional debt collection services. Coast has created systems to ensure our continued compliance with the FDCPA that is a result of the commitment to compliance throughout our organization. This includes an independent Compliance Department, obtaining and maintaining our Professional Practices Management Certification (PPMS), utilizing voice analytic software, thorough training of our staff and established appropriate internal audits and call monitoring procedures.

Quality Assurance and Compliance

The Coast Compliance Department is directly responsible for ensuring that our operations and business practices adhere fully to all local, state, and federal legislation that governs our industry. The Compliance Department is also responsible for adhering to the best practices as recommended by professional organizations such as ACA International (the Association of Credit and Collection Professionals). As a current vendor to the U.S. Department of Education, Coast must maintain standards much higher than other firms in our industry.

We comply with all applicable federal and state regulations governing the collection of government receivables, and data protection including but not limited to the following:

- Fair Debt Collection Practices Act (FDCPA)
- Fair Credit Reporting Act (FCRA)
- Fair and Accurate Credit Transactions Act (FACTA)
- Gramm Leach Bliley Act (GLBA)
- Identity Theft Prevention Program / Red Flag Rules

Voice Analytics Module

One of Coast's most powerful tools is a sophisticated, state-of-the-art voice analytics module (VAM) that constantly monitors the state of a telephone conversation with a taxpayer. Using advanced tone identification technology combined with word/phrase detection, the VAM examines the speech of both the taxpayer and the CCR, assessing the emotions of both parties and alerting the CCR if his or her tone is becoming too harsh, or if the taxpayer is becoming agitated. This information is provided to the representative in real-time, and helps the representative avoid conflicts before they begin. Every representative has a small meter on their desktop that provides constant feedback on the state of the conversation. Using this tool, representatives are able to self-monitor and moderate themselves as well as receive insight into the caller's emotional state as they talk to them. The meter is locked and cannot be closed or minimized by the representative.

The VAM features cutting-edge phrase-detection technology, which we use to ensure that the CCR recites the required Mini-Miranda statement upon confirming contact with the taxpayer. After a pre-determined period of time in each call, a secondary meter will appear to remind the agent to recite the Mini-Miranda if the statement has not yet been said to the taxpayer. Once the Mini-Miranda has been spoken, the ticker will change to green on the agent's desktop.

The VAM is also monitored by the Consumer Care Manager to verify that every taxpayer receives respectful, personalized service. The supervisor has the ability to immediately intervene if a conversation should turn hostile, allowing the supervisor the chance to rapidly diffuse the issue. Through the control panel, the supervisor can see all conversations occurring in real-time, listen to any active conversation, or drill down to see specific agent and call statistics. If a supervisor decides to monitor an active call, he or she has the option to quietly listen in, coach the representative (the taxpayer cannot hear the coaching), or to take over control of the call entirely to prevent escalation.

The screen capture above demonstrates the control panel used by supervisors to monitor collection activity and the live conversations currently taking place with taxpayers.

Every call has a post-call analysis available to the supervisor, who can review these statistics to examine a call, second by second, to see things such as exactly where a call began to degrade and who might be at fault for it.

Call Recording & Monitoring

Coast records all collection telephone calls, where allowed by law, after notifying the taxpayer that we are recording the conversation. This is an excellent tool for reducing liability because records may be retrieved and reviewed at any time by management or at the request of the client to determine if the call was appropriately conducted and adhered to ACA and FDCPA standards. Additionally, members of our Compliance team routinely review call recordings and monitor collector calls to ensure all Representatives are conducting collection efforts according to Coast's protocols. Representatives who receive scores of 100% are recognized at weekly staff meetings.

Coast is committed to providing the highest possible standard of service to our clients and their taxpayers. For this reason, recovery percentages are not the only metric used to determine success. Our Compliance Team performs daily reviews for call quality and compliance to ensure all taxpayers are provided with accurate and complete information and that every call adheres to Coast's strict standards for disclosure, regulatory compliance and clear communication.

1.3 Describe the monitoring process of internal compliance with Federal Bankruptcy Laws in relation to collection efforts.

Bankruptcy

As part of Coast's standard placement process, accounts are "scrubbed" for bankruptcy activity. Clients are promptly notified of any accounts on which an active bankruptcy is identified. The accounts are placed in a do not contact status and our Compliance Department monitors the status of the bankruptcy case on a monthly basis for those accounts the client requests we retain.

If a taxpayer claims bankruptcy when contacted, Coast will request copies of the bankruptcy filing from the taxpayer for verification. In addition, upon being given information about when and where the bankruptcy was filed, Coast will verify online with PACER (Public Access to Court Electronic Records), a nationwide database of the U.S. Appellate, District, and Bankruptcy court records and documents.

Coast will immediately suspend all collection action and notify DOR upon receipt of notice of bankruptcy filing. Coast requests immediate contact so that we may suspend activity should DOR receive notice of filing, in order to avoid any appearance of contravening bankruptcy regulations.

Coast will close and return bankruptcy accounts or suspend activity in accordance with direction from DOR. In the case of Chapter 7 bankruptcy, (no assets cases, which typically last 90 days), it may be more feasible to close and suspend activity as opposed to close and return depending on DOR preference.

1.4 Describe the monitoring process of internal compliance with Identity Theft Prevention Programs in relation to the Federal Government under Red Flag Rules.

Red Flag Rules

A "Red Flag" is an indicator through a pattern, practice, or specific activity that suggests the possible existence of identity theft. For example, a Red Flag might be a taxpayer who contacts Coast after receiving a letter or collection call, alerting us that their identity was stolen. Another example would be a law enforcement official who contacts Coast to let us know that a taxpayer has incurred an identity theft.

The Red Flags Rule provides several examples of Red Flags in four separate categories:

- Alerts and notifications received from credit reporting agencies and third-party service providers
- The presentation of suspicious documents or suspicious identifying information
- Unusual or suspicious account usage patterns
- Notices from a customer, identity theft victim, or law enforcement

To mitigate the occurrence of identity theft, Coast adheres to the Customer Identification Rules set forth in 31 U.S.C 5318(1) (31 CRF 103.121) when obtaining, identifying information about, and verifying the identity of, a person using a covered account or making payment on a covered account. Coast monitors transactions at all times, which may include recording telephone calls where permitted by law and access to any facet of our online system. Access is only by PIN and password and this information is regularly reviewed for anomalies or suspicious activity. Users are deleted when their online access is revoked or dormant.

The purpose of an Incident Response Plan is to provide practical guidelines and actionable steps in order to respond to an incident effectively, efficiently, and consistently. It provides a framework for bringing resources together in an organized manner to deal with adverse events related to Identity Theft (Red Flags) or the safety and security of Coast's information and network systems on any platform or operating system. Adverse events include, but are not limited to, malicious code attacks, unauthorized access to the computer systems, unauthorized utilization of Coast's services, denial of service attacks, general misuse of systems, hoaxes, or identity theft.

Detection and Analysis of Red Flags

Detection and analysis of security incidents consists of identifying an incident occurrence, classifying the incident, analyzing the incident to determine the best mitigation strategy, and notifying the appropriate parties about the incident.

In detection, it must be determined whether the occurrence is an event or an incident. The definitions of both are found below.

An event is any observable occurrence in a system or network. Events include a user connecting to a file share, a server receiving a request for a web page, a user sending email, and a firewall blocking a connection attempt. Adverse events are events with a negative consequence, such as system crashes, network packet floods, unauthorized use of system privileges, defacement of a web page, and execution of malicious code that destroys data.

The definition of an incident has evolved. In the past, an incident was thought of as a security-related adverse event in which there was a loss of data confidentiality, disruption of data or system integrity, or disruption or denial of availability. New types of computer security incidents have emerged since then, necessitating an expanded definition of an incident. An incident can be thought of as a violation or imminent threat of violation of computer security policies, acceptable use policies, or standard security practices.

Containment, Eradication, and Recovery

The containment, eradication, and recovery step in the incident response lifecycle is where a majority of actual incident response takes place. In this step, response teams shall exercise the determined methodology for handling the incident and restore functionality to all systems and processes affected.

Post-Incident Activity

Following an incident, a report on the steps taken and lessons learned must be documented for future reference. These reports will be beneficial in any post incident action require such as litigation and future incident prevention.

Preparation for response to a security incident includes the identification of tools and resources to be utilized during the incident response process.

Addressing Identity Theft

In the event an account has a potential claim of identity theft, the account is placed into a compliance review status and entered into our compliance management system Cast/IMS (Information Management System). This includes all accounts which share the same information (such as the same SSN). Once an account is placed in a compliance review status, no calls or collection notices are sent to the taxpayer, and the Compliance Department will begin the review process.

The Compliance Department will investigate the claim, up to and including requesting the underlying documentation of the account from the client, including promissory notes, authorized signatures, and SSN documentation to verify information on the account. In the instance that fraud is detected, Coast will close and return the account to the client, notify the taxpayer in writing, notify the credit reporting agencies (if applicable) and close the account in our compliance management system. If no evidence of fraud is identified, Coast will update the account within our collection system and return the account to the Operations Department to resume collection efforts.

1.5 Describe the internal process of addressing Bonding and Insurance coverage.

Coast maintains all client and state required bonds. All Coast employees are bonded, including our CCRs. Coast carries extensive policies to protect our business operations and ensure our clients are similarly protected as we conduct collections on their behalf, including coverage for events involving errors, acts, and omissions. Our coverage and amounts are detailed in the table below:

Type of Insurance	Insurance Carrier	Limit
Commercial General Liability	Sentinel Insurance Co. LTD	$2,000,000 each occurrence $4,000,000 aggregate
Umbrella Liability	Sentinel Insurance Co. LTD.	$3,000,000 each occurrence $3,000,000 aggregate
Professional Liability and E&O	Great American Fidelity Insurance Company	$5,000,000 each claim / aggregate
Worker's Compensation	Traveler's Cas. Ins. Co of America	$1,000,000 each occurrence
Crime / Employee Dishonesty	Traveler's Casualty & Surety Company of America	$5,000,000
Cyber Liability	Lloyd's of London	$3,000,000

Describe additional measures used to ensure the following:

2.1 Confidentiality and security of Protected Information (private and confidential).

Data Security Efforts

Data Security is a paramount concern at Coast Professional, Inc. We recognize our fiduciary responsibility to our clients includes protecting data that is entrusted to us. Our IT Department has worked closely with our Executive Team to develop, implement, and maintain security protocols that are among the best in the industry. Please refer to our Information Security Plan in **Exhibit I**, which outlines the measures that Coast follows in order to maintain the security of your data.

Coast has invested heavily into the policies, procedures, and technologies used to secure the IT environment and data residing within it. The first step in developing a world-class information security platform is to classify the data and to develop data flow diagrams to understand where the classified data is at all times. All taxpayer data and PCI data is encrypted at rest. This includes encryption within our collection system software, FTP servers, and file server where this data is sitting at rest. In order to access our data, Coast utilizes Role Based Access methodologies to give staff access to only what they need in order to perform their jobs. While the data at rest encryption is important to us, we also work to make sure that data that is transmitted, especially over any public networks, is encrypted during that transmission. Coast utilizes a file transfer product which allows Coast to receive data via secure methods such as SSH, SSL, and HTTPS. In addition, all data stored on our FTP server is encrypted at rest with 256-bit AES FIPS 140-2 validated encryption.

Our firewall protects internal servers and internal/external access through layers of passwords and encryption at multiple levels of our network. Coast has also contracted with Ontario Systems, LLC to provide us with 24 hour service in order to assist with any and all modifications to enhance our collection and reporting abilities on our clients' behalf. Coast has in place standards and guidelines governing the use of electronic resources including firewall and wireless access and use policies. Coast will take reasonable and appropriate steps consistent with current technological developments to make sure that PII is secure and to safeguard the integrity of records in storage.

Coast has implemented many layers of security which starts at the perimeter of the network and has implemented highly available firewalls with IPS modules that are configured to alert to Coast's centralized Security and Event log server. On the local networks, all systems are hardened according to NIST best practices following strict group policy and hardening procedures. These procedures are completed on each system individually to ensure that specific applications are locked down according to best practices. For traffic leaving the network via email, Coast has implemented data loss prevention technology on email traffic that is considered confidential or that pertains to PCI, HIPAA, and other taxpayer information.

Coast uses a centralized security log and file integrity monitoring software from OSSEC. OSSEC alerts staff of system level file changes as well as longs any activity happening across all devices in the environment, including firewalls, IPS's, servers, applications, and antivirus. Coast utilizes its centralized security logging system to aggregate the logs for all systems and devices so that a real time view of all activity occurring within the environment can be generated. Coast has a list of alerts that are considered important and that trigger alerts to the IT team for review or investigation. These alerts do include user logical access events. In the event of a breach that required a notification, Coast would follow the appropriate state breach notification laws that pertain to the data in question.

Coast is devoted to safeguarding the confidential taxpayer information with which we have been entrusted. We comply with Gramm-Leach Bliley Act (GLBA), Red Flags Rules and all other regulations covering data security. Coast's strict protocols and procedures have been designed, developed, and tested to protect internal data in the event of a cyber or other potential data security breach. In addition, internal and external physical and facility access and control are maintained through layers of right to use parameters at multiple levels of our hardware, software, network, data center, and production areas.

Physical Security

Coast has the physical security necessary to protect client and taxpayer data that meets stringent federal government security standards. Coast has addressed the physical security of our employees and the sensitive data entrusted to our care by limiting access to only those employees who have a business reason to know such information. Physical and administrative controls to prevent unauthorized entry into Coast facilities have been established. Coast has 100% controlled access requiring photo-identification and access permissions from management to enter the buildings. Cardkeys provide both authorization and accountability. The following physical access controls are in place at each Coast facility (list not exhaustive):

- All firewalls, switches, servers, and Local Area Network (LAN) are located in secured data closets
- All visitors must have an escort with while in the facility
- All visitors require visitor badges and must sign in at the front desk
- Card access system to enter/exit the Data Center (including card logging system)
- Data Center has no external windows
- Data Center is located in an unidentified room
- Employees are required to display their photo identification badges at all times while in the facility, as well as utilize their fobs for entrance to all secured areas
- Front desk receptionist at the entrance to the facility to monitor all access by visitors and employees
- Receptionists maintain logs to record the entry and departure of all visitors

Our database hardware is housed in a locking rack chassis located within a further access controlled restricted entry data center. Coast contracts for onsite shredding and destruction of all documents containing confidential taxpayer information and other sensitive documents. Access control to the software and hardware is only permitted by authorized personnel under rigorous physical, software, and password protection. All staff is required to complete regular security awareness training including facility, data access, and document control, as well as all other federal security requirements, specifically including the Gramm Leach Bliley Act (GLBA) concerning privacy.

2.2 Protect against any anticipated hazards or threats to the integrity or security of such information.

Coast has staff dedicated to the protection of clients, taxpayer, and Coast data. This is accomplished through multiple departments and procedures designed to reduce and eliminate the potential for hazards or threats to the integrity or security of information entrusted with Coast. This includes:

- Daily, weekly, and monthly data backup and archiving
- Data sanitation procedures and record retention policies
- Detailed disaster recovery plan
- Documented security policies
- Established security mechanisms to detect intrusion attempts and alert appropriate staff
- Firewalls, web filters, and content monitoring
- Frequent staff training on information and security standards
- Protecting data in transit and at rest
- Spam filters and email archiving
- Staff on call 24/7/365 to respond to potential and real threats to information
- System, infrastructure, and data redundancy
- Utilizing secure methods of data exchange between Coast and clients

Coast has provided a detailed explanation of our disaster recovery process on the following pages.

Disaster Recovery

Coast has a well-developed disaster recovery plan with a documented strategy to ensure continued operations in the event of a disaster or threat. Coast has an emergency toll-free line for employees to retrieve updated information regarding the status. This emergency line notifies the disaster recovery team and key personnel that the disaster recovery plan has been implemented and that they are to report to the designated location to continue vital operations for the company.

Coast's Disaster Recovery, Business Continuity, and Cyber Incident Prevention and Reporting plans are designed to identify the strategies, resources, and actions necessary to resume essential business functions for critical operational units (departments) in the event of an unplanned disaster, loss of facility, or breach of data security protocols. The plans below have been developed, documented, and exercised to ensure a full business and system recovery including implementation, a course of action, and contingency planning.

- A secondary recovery site – We have designated our Geneseo, NY facility as our recovery site
- Real-time recovery processes and hardware built for critical applications and servers
- A telecommunication strategy devised to switch both voice and data
- Building management conducts semi-annual testing on building evacuations, emergencies, security awareness, and business resumption and system readiness procedures

Our Contingency Planning program includes plan development, plan maintenance, and project management. Coast's Plan Development includes plan creation by the corporate disaster (system or facility) recovery coordinator with assistance from each business unit's Disaster Recovery Coordinator and the Executive Management Team.

Plan Maintenance: Coast's Plan Maintenance consists of ongoing maintenance and enhancement activities including at least two (2) exercises per business unit year. Corporate Disaster Recovery Coordinators and each business unit's recover team conduct their exercises and make modifications to their plans between exercises.

Project Management: Coast's Project Management involves comprehensive project management assistance during the initial and subsequent plan maintenance phases of the project. The business unit head(s) are responsible for the signoffs on acknowledged and completed disaster recovery and security plans. Administrative review and approval is required on all changes or enhancements on contingency plans.

Cyber Incident Prevention and Reporting Program: Coast's Cyber Incident Prevention and Reporting Program incorporate thorough prevention warning and response program protocols, coordinated by our Information Systems Manager throughout all business units. These proactive processes are designed around detection and treatment of potential cyber security attempts or incidents. These incidents include internal or external successful or unsuccessful access attempts and unauthorized use, virus or Trojan horse, or malicious code infection, or any other intentional or unintentional access, control, or loss of data.

All systems-detected or employee-reported events are intensively investigated and corrective measures and procedures are initiated immediately to protect data integrity, confidentiality, hardware, software, and overall secure operational readiness. **If an event occurred, Coast would immediately inform all clients of the nature of a successful or unsuccessful breach of security.** All records of such incidents are maintained in Coast's Information Systems (IS) area.

Coast completes disaster recovery, business continuity, and cyber incident prevention reports testing on a bi-annual basis. Our procedures' manuals are stored in two (2) different locations. Our test results are maintained by Human Resources and the Information Systems Manager.

Our operating system and database hard drives and backups are layered in order to best secure our client's information from potential disasters, security breach attempts, and/or hardware or software failures. Redundant Array of Independent Disks (RAID) redundancy coupled with real-time file journaling ensures restoring capabilities to the last activity entered into the system prior to a failure on one or all systems.

Coast uses a centralized security log and file integrity monitoring software from OSSEC. OSSEC alerts staff of system level file changes as well as logs any activity happening across all devices in the environment, including firewalls, IPS's, servers, applications, and antivirus. Coast utilizes its centralized security logging system to aggregate the logs for all systems and devices so that a real time view of activity occurring within the environment can be generated. Coast has a list of alerts that are considered important and that trigger alerts to the IT team for review or investigation. These alerts do include user logical access events. In the event of a breach that required a notification, Coast would follow the appropriate state breach notification laws that pertain to the data in question.

2.3 Protect against unauthorized access or disclosure of information.

In order to protect against the unauthorized access or disclosure of information, Coast has implemented multiple access procedures from an information security standpoint. This includes, but is not limited to:

- Computers are monitored and controlled by the Company's Information Technology team
- Document control process with secure shredding
- Documented employee termination process to immediately remove access to information (as applicable)
- Establishing control methodologies and tools to monitor all activity, including attempted activity
- Mandated frequent password changes and strong password policy
- Periodic Personally Identifiable (PII) audits and clean desk policies
- Personal cell phones and other recording equipment are not allowed within Coast office (except for documented business need)
- Providing access to information based on a documented business need
- Regular audits of authorized access
- Secure locations that provide physical barriers to office space with additional access restriction to server rooms
- Significant firewall and security assets are implemented to ensure appropriate external communication channels

In addition to the information security controls in place, Coast ensures that our communications with taxpayers do not provide unauthorized disclosure of information.

Right Party Contact Verification

It is a requirement for all live calls receive notice that the call may be monitored and recorded (per federal, state and local laws and regulations).

Our representatives are trained to discuss the debt only with the taxpayer, the taxpayer's spouse, or the taxpayer's legal representation. We may contact neighbors and coworkers during skip tracing efforts, but at no point are representatives permitted to disclose the nature of our business with the taxpayer.

2.4 Prevent any other action that could result in substantial harm to the State or an individual identified with the data or information in the Contractor's custody.

Coast conducts all operations to prevent actions that could result in harm to our clients and our business. The multiple layers of data security, physical security, and security protocols employed by Coast are among the best in the industry.

Paper Records

Documents containing sensitive data must be destroyed in accordance with Pub 1075. Employees are responsible for the disposing of sensitive paper records, including those containing sensitive data, in the provided locked shred bins or alternatively flagging the box of documentation for shredding by an approved and licensed outsource provider.

The shredding firm maintains several secure shred bins at Coast. Each week, firm representatives arrive at Coast to pick up the contents of the shred bins for secure on-site destruction. A Coast employee escorts the representatives to each shred bin to verify the contents are emptied and shredded. After the process is complete, the pickup log is signed by both the Coast employee and the representative. A copy of the log is kept on file.

Visitor Security

Coast requires all visitors to sign in, present photo identification and be escorted throughout our facilities at all times. Coast's visitor log captures the following information:

- Name
- Date
- Reason for visit
- Person they are visiting
- Time in / out
- The type of photo ID presented (Photo ID required)
- Their signature, signature of person signing them in
- The visitor badge number
- If they have a cellphone or laptop with them (outside electronics are not allowed within our facilities unless expressly approved)

Coast keeps all visitor logs in a secured storage closet which only specific HR employees have access to. All visitor logs are kept indefinitely.

Screen Locking

All Coast employees are required to lock their computer monitors before stepping away from their desks.

Describe the following process:

3.1 Describe your company's process for vendor management and oversight by clients? What oversight activities, processes, or interactions should DOR expect from its receivables management provider?

Coast has a documented vendor management and onboarding process to ensure that any subcontractor utilized meet our strict standards of professionalism, information security, and compliance. DOR should expect that all of its agencies would hold any vendors or subcontractors to the same high standards by which it abides.

With Coast as a partner, DOR would not have to interact with any vendor or subcontractor entities.

To protect our client's data and ensure compliance with all contractual requirements, Coast requires Interconnection agreements to be in place with all of our service vendors. All vendors are required to sign a non-disclosure agreement and contracts are reviewed annually. Contracts with vendors require them to adhere to an agreed upon standard of body controls, including but not limited to:

- ISO 27002
- GLBA
- NIST 800-53 Revision 4

All third-party vendors are assessed based on level of access to client data, approved business purpose with the data, and the stringent safeguards they have in place to protect Coast and client data.

Describe the following processes:

4.1 Debtor complaint management and reporting of complaints to client.

Complaint Management

Coast conducts our collection operations in the most professional and ethical manner possible. Complaints are common in our industry; however, we treat every complaint with the utmost seriousness and investigate it fully. The vast majority of complaints are brought by taxpayers attempting to avoid their financial obligation. In the instances where the complaint is legitimate, we immediately initiate corrective action, which can include retraining for our representatives, revision of our collection practices, or termination of any representatives who have demonstrated actions that do not align with Coast's standards of professionalism, courtesy, and respect for taxpayers. Coast Professional is an accredited business by the Better Business Bureau, and maintains an A+ rating from the BBB.

Although Coast aims to conduct all of our collection efforts in the most professional and taxpayer-friendly manner possible and in compliance with all the laws and regulations that govern our industry, we recognize that complaints do happen in spite of our best efforts. For this reason, we have developed an extensive process to rapidly address any inquiry or complaint we receive, whether it comes directly from a taxpayer, or is

part of an inquiry submitted by a third-party agency, such as the Consumer Financial Protection Bureau (CFPB) or the Better Business Bureau (BBB).

Coast carefully reviews every written complaint received and responds to it in a prompt and professional manner. All incoming written complaints are scanned and then forwarded to Coast's Compliance Department. All complaints are logged into our internal tracking system. The taxpayer's account is flagged as having filed a complaint, and all collection activity ceases until a thorough investigation has been conducted. Throughout the entire complaint process, Coast works closely with our client to ensure they are informed of the latest developments in the investigation.

The compliance representative assigned to the case researches the complaint, pulling references and evidence, such as call recordings, audit logs from the collection platform, and documentation from the client in order to assess the issue. Based on these findings, the compliance representative will develop an initial response to the complaint and consult with the appropriate director to review the response. Each response is submitted to our legal team for final review and is then forwarded to the appropriate party (e.g. the submitting agency, the taxpayer, or the client). Finally, the complaint resolution detail is updated in the complaint management system, and, depending on the outcome, the taxpayer's account is cleared for collection activity and returned to the collection queue.

If the investigation reveals that a Coast employee acted improperly or that a policy has failed, the appropriate director will take steps to correct the issue, whether working with Compliance to implement policy changes, or working with Human Resources to initiate corrective action for the employee who was responsible for the complaint. Depending on the severity of the mistake, corrective action can range from a simple verbal warning up to and including termination.

All hard copy documentation received relating to the complaint, including the original communication from the taxpayer and any supporting information received through the investigation, is retained electronically in a shared secure folder and/or the taxpayer's account file. Depending on client preference, Coast reports all valid complaints with the outcome of our investigation. In any instance where a complaint may result in a negative action against DOR, Coast would immediately notify DOR and would take all necessary steps to mitigate any negative outcome for DOR.

4.2 Resolving debtor disputes.

Dispute Resolution Process

When a dispute is received from a taxpayer, whether verbally or in writing, the account is placed into a dispute status to prevent any further collection activity while the dispute is in process. The dispute is logged into our Cast/IMS management system and is reviewed by the Compliance team. It is then referred to the Client Service team to request validation from the client. Validation can be retrieved from DOR's system if access is provided. Once validation is received, it is reviewed by the Compliance Department to ensure it is complete and that balance information is in agreement with the amount placed with Coast for collection. Adequate validation is then sent to the taxpayer, and the account is placed back into an active collection status five (5) days after the validation is sent via certified mail to the taxpayer. Each step of the dispute process is monitored by the Compliance Department and is tracked in our Cast/IMS system.

In the event that the validation received does not corroborate the balance in our system, Client Service will follow up with the client to resolve any discrepancies. If validation is not received or is not available, the account will be closed due to dispute with no documents.

4.3 Internal training programs, quality programs, and operational process improvement.

Coast works with clients to adjust its operational process.

Continuous Improvement

Coast's goal is to be the best in the industry. With that goal in mind, Coast has committed extensive resources to quality and training. Our PPMS Certification was a first step to developing a world-class compliance and quality program. Using this process, Coast continually monitors performance, compliance, and training efforts.

PPMS Certification

In early 2014, Coast obtained our Professional Practices Management System (PPMS) Certification, which has proven to be the optimal tool to prepare us for compliance with CFPB regulations. PPMS introduces collection agencies to industry-specific business practices and procedures that, once implemented, lead to the operation of an efficient, fiscally sound, ethically responsible and legally compliant organization. To achieve and maintain PPMS Certification status, collection agencies must complete a rigorous application and audit process. Certified agencies must meet program requirements including developing an individualized professional practices system of management for their agency, creating supporting documents such as a company manual and submitting specific business records to an independent auditor to assure compliance with the program's high standards for collection agency operations. Periodic audits are conducted for an agency to maintain their certified status.

PPMS certification is a comprehensive process and, to date, 46 agencies globally share the unique distinction of being PPMS certified by ACA International.

New Hire Training

The goal of our new hire training program is to prepare our staff for a long-term career in collections. Coast emphasizes both education and training and allocates substantial resources to fostering personal and professional growth in our employees. Our staff is our most important asset, and their continual development is a top priority.

To ensure our clients' needs are fully met, all Coast CCRs must attend a two-month, hands-on training program when hired. The training encompasses the Fair Debt Collection Practices Act (FDCPA) regulations and their application, Professional Telephone Collectors Techniques (PTCT), state laws and rights, responsibilities and options of the taxpayer, accessing and operating our collection system, tactics training, and daily routines.

Coast understands that not every individual retains information in the same way, and so our training program is diverse in its delivery. Training may be conducted through classroom instruction and discussion, one-on-one sessions, videos, voice recordings, and scenario-based role playing exercises.

Industry and Coast-specific training encompasses, but is not limited to the following:

- Bankruptcy law and its application in the education industry
- Client specific requirements
- Concepts of reducing default
- Consolidation
- Dispute procedures
- Federal load regulations, guidelines, and specific processes
- Legal filing requirements and process
- Rehabilitation

Training and FDCPA Compliance

Coast CCRs must pass the American Collector Association (ACA) FDCPA and the Professional Telephone Collectors Technique (PTCT) tests with a score of 100% before they can move on to the collection system and telephone collection training and activity. Our CCRs must also pass a series of internal tests and quizzes pertaining to repayment programs, bankruptcy law, and its application to collection and collection techniques. Coast and its employees adhere to the American Collector's Association Code of Ethics. In addition to this training, a manager or mentor may determine through direct observation that a CCR needs additional support or training which is provided. This assessment continues through a Representative's entire career with Coast.

Ongoing Training

Coast takes pride in creating effective and caring CCRs. As industry requirements change, training is provided and CCRs are kept in the information loop with access to updated laws, regulations, and policies. When Coast adds a client, their assigned teams are briefed on the specifics of that client's collection program and expectations. They become familiar with its location, culture, portfolio, staff, needs, and goals.

- Changes are discussed in weekly staff meetings
- Policy changes are disseminated in writing and electronically
- Online training manual is updated with any changes, as they occur
- CCRs attend ACA teleseminars and webinars
- Relevant publications are distributed on a regular bases

Training Top 125 Award

In November 2019, Coast received a Training Top 125 Award from Training Magazine. The Training Top 125 Awards recognize organizations with the most successful learning and development programs in the world. The Top 125 rankings are calculated based on corporate training overall, including the number of training hours per employee program, total training budget, and innovative learning goals. Coast has worked diligently to establish a world-class training program resulting in the recognition from Training Magazine. This award is a direct result of Coast's improved employee training programs, exemplary customer service, and compliance standards.

4.4 Client provision of input into the collections processes.

Coast welcomes client feedback to continually improve our collection processes. Coast will be flexible and respond to the needs of DOR.

Coast's Account Executives regularly communicate and meet with clients to ensure that our services meet their expectations. Additionally, Coast's Client Service Department communicates with clients regarding any questions, concerns, issues, or changes to their accounts. Through this process, Coast receives feedback from clients on a regular basis. Coast's Client Service team also communicates with clients on a monthly or quarterly basis (based on client preference) to gain feedback about anything that needs to be updated, or if there are any service issues. Coast has also created an annual Client Survey which asks for feedback.

The goal of Coast's Client Service team is to provide the best service in the industry. This commitment to the highest standards of service sets Coast apart from the others in the industry. Clients are provided with a single email address that is distributed to the entire Client Service team, including managers and the director. We provide a toll free number that rings at the desks of all Client Service representatives, and we offer online access for DOR personnel with *real-time access to taxpayer accounts* as well as reports, acknowledgements, and invoices.

Coast has setup the following email addresses to allow our clients to provide feedback to our team:

- clientfeedback@coastprofessional.com : This email address allows clients to provide feedback directly to the client service team.
- wecare@coastprofessional.com : This email address allows clients to provide feedback directly to Coast's executive team.

Coast clients benefit from the subject matter experts who comprise our team. Our clients routinely contact our team for guidance and information on compliance-related matters. Our team is available to assist our clients – even if it is not related to an account that has been placed with Coast for collections. It is the goal of Coast's Client Service team to make every client feel as if they are Coast's only client.

Diana Day, National Account Executive
Ms. Day joined Coast in 2019 and brings with her two decades of accounts receivable management expertise. Ms. Day has worked in the service of government clients for nearly 20 years, having previously served as the client services manager for a Fortune 100 company specializing the collection of past due student receivables, and as a national account executive for one of the country's government collection agencies. Upon contract implementation, Ms. Day will remain the designated contact person for all communications regarding our collection services and contract performance.

(585) 667-2906
dday@coastprofessional.com

4.5 Audits by the client.

Coast conducts its operations with full transparency to our clients. Upon request, Coast provides our clients with records as needed. Clients have online account access to be able to review specific accounts and to obtain reports at will. Coast also welcomes clients to conduct on-site reviews and audits after proper notice is provided so that Coast can schedule the appropriate staff members and meeting space.

As part of the RFP process, some of our clients have conducted on-site reviews and staff interviews. Some clients also request that Coast provide access to a specified number of taxpayer call recordings on a quarterly basis so that they can monitor actual taxpayer interactions with our representatives.

Third-Party Audits

Coast complies with all client audits. Coast undergoes a standard financial audit annually and is PCI-DSS Level 1 compliant as well. Coast is compliant with the Federal Information Security Management Act (FISMA). It is important to note that not all debt recovery agencies are FISMA compliant.

As a contractor for the U.S. Department of Education, guaranty agencies, and hundreds of colleges and universities, we participate in annual audit. We have an unprecedented 18 years with no findings in our annual Title IV Compliance audit.

SOC I Type I

In September 2016, Coast received its SOC I Type I audit. This audit is between Coast and its current clients. Coast only demonstrates its adherence to specific service requirements currently maintained. This audit is typically not applicable to clients who were not originally part of the audit and is generally not disclosed to outside organizations.

4.6 Real-time access to files by client.

Coast will provide DOR with real-time access to our collection environment utilizing Virtual Private Network (VPN). This will allow Coast to provide DOR with access to their information, while ensuring the segregation of DOR information from other client data. DOR will be provided with appropriate usernames, access tokens, access permissions, and training on how to view information on our system. Coast will work with DOR to ensure that contractual requirements and client expectations regarding access to files are met.

4.7 Reporting to credit bureaus.

Credit Bureau Reporting

At the direction of DOR, Coast will report delinquent accounts that are not already reported by the State to national credit bureaus (Experian, and/or TransUnion). We report delinquencies to credit bureaus after 45 days. During this period, representatives work diligently to leverage the prospect of credit bureau reporting while urging taxpayers to remit payment-in-full. DOR has the option to further delay credit reporting and to establish a minimum amount to be reported.

Coast uses credit bureau reporting as a collection tool in accordance with DOR policy, federal statutes, and client guidelines. Credit bureau reports are updated electronically once a week and manually on a daily basis. Similarly, Coast removes resolved or cancelled accounts from credit reports electronically once a week and manually on a daily basis.

If a taxpayer disputes the validity of a debt, Coast immediately ceases all collection activity, including reporting the account as disputed to the credit bureaus. We gather all necessary documentation from DOR to prove or disprove the debt. If we are unable to prove the debt's validity, we inform the taxpayer and resume any reports or updates to the credit bureaus. If the debt is ruled invalid, we will immediately close the account and remove it from the credit bureaus to which it has been reported. Please note: under the Fair Credit Reporting Act, as a Data Furnisher, Coast is required to have DOR provide us with the date of birth, date of service, date of delinquency, and date of last payment, if one exists. If the taxpayer disputes the report with the credit reporting agency, we may also require a full itemization of charges so we can prove their validity.

In 2015, Experian notified data furnishers that they will no longer accept reports for various non-voluntary debts such as parking and library fines. As a result, we are unable to report the restricted types of debt. Effective June 15, 2016, the National Consumer Assistance Plan was fully implemented by the credit reporting agencies. This Plan prohibits collection agencies and debt buyers from reporting on debts that did not arise from a contract or agreement to pay. Therefore, additional restrictions may apply on the types of information that may be legally reported to and accepted by the credit bureaus.

4.8 Out-of-state collection, litigation and lien enforcement.

Coast is licensed and bonded to collect debt nationally, in compliance with each state's unique licensing requirements. Coast can contact, collect from taxpayers, and assist in lien enforcement in all 50 states and U.S. territories. Our hours are staggered so that we can contact DOR's taxpayers during the appropriate times regardless of their time zones.

We strive to avoid litigation whenever possible, but acknowledge that sometimes a suit is the only way to recover a debt. Every account that is referred to Coast will go through our collection process. Using effective collection techniques, we make numerous attempts to resolve the account with a reasonable payment schedule.

Litigation Procedures

If DOR requests Coast to provide litigation services, Coast has provided an overview of the steps taken. Coast's pre-litigation review is undertaken for accounts with balances of $2,000 or more and includes a complete assessment of the feasibility of successful litigation in compliance with federal and state regulations. This includes, among other things, a review of taxpayer demographics, employment, and assets. This process should take no longer than 60 additional days since the majority of asset gathering has already taken place in the initial collection process.

To prepare an account for litigation, we examine multiple aspects, including:

- Location
- Account balance
- Assets
- Credit score
- Outstanding collection accounts or judgments
- Employment information, including income and whether or not wage garnishment is permitted in the taxpayer's state (if outside Nebraska)

When asset information has been compiled, and a Coast Consumer Care Manager has reviewed the account, it will be forwarded to DOR along with a written recommendation to pursue legal action. It is important to note that we regard litigation as a last resort option. Our primary goal is to reach an amicable solution with the taxpayer well before the need for legal action.

Neb. Rev. Stat. § 77-377.02 provides in part, "[f]ees for services, reimbursements, or other remuneration to such collection agency shall be based on the amount of tax, penalty, and interest actually collected... not in excess of fifty percent of the total amount of delinquent taxes, penalties, and interest actually collected.

5.1 Describe financial incentives and penalties to promote optimal performance in receivables management.

For DOR to incentive optimal performance in collection services, Coast suggests that DOR consider the following:

- Selection of Agencies: DOR should identify and select an agency that exemplifies the customer service ideals, ethical business practices, and results-driven performance history of DOR. The agency should be capable of working as an extension of your office and managing the collection process on behalf of DOR with no disruptions to taxpayers.
- Financial Incentives: DOR may develop a competitive bonus based on their agency hitting key performance metrics established by DOR. This could include metrics such as recovery rate, compliance metrics, or customer satisfaction scores.

Describe the policies and practices for:

6.1 Accounting for and treatment of contract based fees related to payments directly received by DOR after a claim is placed.

Coast is open to discussing specific situations (for example, payments received with 24 hours o agency placement or special amnesty or offset programs) and the potential reduction or waiver of fees when the payment received directly by DOR. Our current clients routinely accept payments from taxpayers and notify Coast of the payments. In those instances, Coast applies the payments and invoices the client for the associated fees. Payments received by Coast will be remitted net of fees due as is the stated preference of DOR.

6.2 Account cancellations or recalls from the client.

Cancellations

Coast will close and return an account upon review and upon request from DOR at any time.

To request account closure, DOR can simply email our client service department at CS@CoastProfessional.com. Coast requests that the cancellation requests contain the reason for closure to complete the file.

Included as part of our monthly report package, DOR may expect a Cancel and Return Report. This report itemizes cancelled accounts along with the reason for cancellation and closure. The Report lists accounts and the reason for cancellation and closure, such as unable to locate, unable to pay, etc.

6.3 How tax amnesty programs are addressed from a fee perspective.

We recognize DOR's right to utilize tax amnesty programs to resolve outstanding obligations. Coast is open to discussing our role in amnesty programs and the potential reduction or waiver of fees when the program in managed by DOR and payment is received directly by DOR. Likewise, we are interested in presenting managed service options which might enable Coast to conduct an amnesty program on DOR's behalf under a distinct fee structure.

In the event DOR conducts an amnesty program, Coast will not charge a fee for reductions to balance amounts based on amnesty programs. Coast will also close and return accounts completed through a tax amnesty program as appropriate and required.

6.4 Maintenance of a separate trust account for payments received for DOR.

Coast understands DOR requires a separate trust account. Coast has several different trust accounts dedicated to specific business lines and in compliance with contractual requirements. Coast's system includes a complete "Trust Accounting," incorporating net/gross capability, invoicing capability, and integration to our host accounting system's General Ledger.

7.1 What aspects of a receivable management solution are most likely to determine the success of the solution in practice?

While success of a receivable management solution will vary based on a number of factors, the age of accounts is usually one of the most significant factors. The older an account is, the less likely it is recoverable. The frequency of calls and letters will have a direct impact on the success of a program. Advanced skip tracing tools are also vital to the success of any program.

Coast has also developed an industry leading collection process which utilizes a combination of mailed correspondence, telephone contact, and cutting-edge skip tracing techniques to effectively communicate with and locate taxpayers. Our collection process includes a combination of systematic workflows and the talent of highly trained staff who are experts in compliant communication with taxpayers. The collection process is in compliance with DOR's requirements in addition to federal, state, and local laws and regulations. Coast has provided an overview of our collection process and the specific procedures for effective taxpayer communication in the pages that follow.

Factors that DOR should consider for an agency that will influence the success of a solution in practice are:

- Ability to quickly revamp up for additional account volume
- Cutting Edge Skip Tracing Technologies
- Dedicated Compliance Department with statistically significant call review process
- Flexible hours to reach taxpayers during optimal hours
- Nationwide licensing
- On Site IT Department with programming and support capabilities
- Online access for taxpayers and clients

8.1 Describe additional information DOR consider in procuring receivables management services.

Client Service

We offer a dedicated client service team, of which is available Monday – Friday, 8:00 am – 7:00 pm Central Standard Time (CST). Our staff is readily available and willing to help each individual client as if they were our only client.

Sending and Retrieving Files

Coast has the ability to securely send data and funds electronically through various methods. This includes, but is not limited to, email, SFTP, and ACH. Coast will work with the Department to establish secure and expeditious channels of data exchange.

Payment Processing

Coast offers taxpayers the ability to process payments without any convenience fees. Taxpayers can make payments online using mobile-friendly platforms, by phone or by mail. Taxpayers can by with check, credit or debit card, money order or Western Union.

Payment Posting
All payments received are posted daily. Accounting staff record each payment on a deposit record. Each recorded batch is totaled at close of business daily. It is then cross-checked with the internal balance report which totals that deposit. Accounts and sub-accounts must tie or the batch will undergo further reconciliation to identify and correct the issue causing the error.

Correct and reconciled accounts are transferred to escrow accounts where they are verified by the accounting supervisor and signed off by the accounting staff. The deposit is banked and debit card payments are electronically transmitted to close the day.

Monthly system balances are tallied from deposit logs, monthly report totals, and statement totals. All systems are cross-checked and verified before statements are generated. These totals are reconciled to bank statements when those are received.

Cash Payments
Cash payments are rarely received. Upon receipt of a cash payment, Coast must immediately photocopy the payment and generate a receipt for the amount of payment to whose account said payment is to be applied. Receipt of a cash payment requires two observer's signatures in both the mail distribution and the posting processes. The cash payment is stored in a lockbox inside Coast's secured facility until it can be processed and deposited.

Direct Payments
Taxpayers who make payments directly to the client usually do so in the belief that they may avoid the consequences of collection. In the case of direct payments, DOR can deposit the funds locally, notify us of the payment amount and date, and we can bill DOR. Alternatively, DOR can mail the checks directly to Coast so that we can deposit them and net out any commissions as if the payments were received by Coast. These determinations are made during client set up and are handled on a client by client basis.

When Coast receives notice directly from a client of a direct payment, we will immediately notate that account and suspend further collection activity if the balance has been resolved. The date of the payment will be entered into Coast's system and the direct payment will be reflected on the month end and trust statements, or on a separate Direct Payment Statement, based on DOR original setup parameters.

If a taxpayer states that a direct payment has been made, Coast will verify this with DOR in order to correctly post payment if the payment was received.

Remittance to Clients
Coast can remit funds and statements via paper or electronically to DOR, at the frequency requested by DOR. We can remit weekly, semi-monthly, or monthly.

Our ACH monthly clients receive funds and statements by the fifth business day after month end. Clients who prefer monthly paper remittances will have their remittances postmarked no later than the 5th day after month end or the first business day after the 5th of the month if the 5th is on a weekend.

Overpayments
If a taxpayer overpays via personal funds, Coast will verify the total amount versus the balance owed using DOR's most current records prior to posting.

If it we discover there has been an overpayment, the surplus will be refunded to the taxpayer, which is then reflected on the account record online and in a report generated by Accounting that shows monthly overpayments.

Application of Tax Offsets
Payments such as tax offsets are treated as a reduction of the account balance. When notice of a tax offset payment is received Coast will apply it as an adjustment with an appropriate file notation. Collection fees are not charged on tax offsets and valid adjustments to an account balance.

Invoice Adjustment Procedures
Coast understands that at times it is necessary to make invoice corrections. These are typically the result of an adjustment request made by DOR. Consequently, a generated invoice may request an overpayment or underpayment from DOR. Coast makes every effort to ensure that our clients are accurately billed, and we will make modifications to invoices as necessary.

9.1 Describe all sub-contracting/outsourcing of the collection or payment process, including but not limited to which part is being outsourced and to whom.

Coast does not anticipate utilizing subcontracting, partnering, and/or teaming arrangements with any third-party collection agencies for the purposes of this procurement. Coast will utilize third party vendors for ancillary operational processes on this contract. Examples of this include:

- Litigation
- Mail production
- Skip tracing

Coast does not outsource any data processing. To protect our client's data and ensure compliance with all contractual requirements, Coast requires Interconnection agreements to be in place with all of our skip trace vendors, place of employment vendors, and letter printing vendors. All vendors are required to sign a non-disclosure agreement and contracts are reviewed annually. Contracts with vendors require them to adhere to an agreed upon standard body of controls, including:

- PCI DSS
- ISO 27002
- GLBA

All third party vendors are assessed based on what access they have to client data, their approved business purpose with data, and the stringent safeguards they have in place to protect Coast and client data.

Skip Trace Vendors

Coast utilizes the following skip trace vendors to assist our CCRs in locating the taxpayer effectively:

Skip Tracing Sources/Services	
Accurint	TALX
Experian	LexisNexis
VeriFacts	Netwise
Teletrack	CBC Innovis
Credit reporting agencies	Batch processes

10.1 Describe information technology (IT) requirements needed to enable efficient transferring of information between DOR and your company.

When Coast accepts account placements, we utilize Secure File Transfer Protocol (SFTP), secure encrypted email, facsimile (fax), US mail, courier services (such as Fed Ex), or other client-specific electronic formats. We request that standard information be provided, such as demographic and balance due information, and that methods of transmission be secure. Accounts are typically emailed or placed via Secure FTP. Coast also requests to be provided DOR file layouts, reporting requirements, and any specific data exchange needs.

For clients who do not host their own SFTP for data exchange with the agency, Coast creates Secure FTP accounts and provides usernames and passwords to the user-friendly interface. This allows files to be uploaded and transmitted securely without additional concern for the security of data. This method would be the best for batch placements. Additionally, accounts can be placed individually via our online interface, using the same login as is used to view accounts.

Coast is able to set up automatic data information interfaces that will send and receive information on the schedule requested or required by the client. Our dedicated IT Department works with clients and the Account Executive assigned to the client to efficiently and accurately set up, test and deliver the required solution.

11.1 Is there a particular type of debt your solution has been found to excel at collecting? Describe or list the types of debt (age, dollar amount, type of tax etc.) recovery for which the solution is designed or for which it particularly excels.

Coast specializes in accounts owed to government agencies and strives to be a top-performer on all account types. As such, we are experts in preparing custom teams to maximize liquidation on each unique debt pool (personal income tax, corporate tax, etc.). Within the collection unit, we further segment the business by proprietary factors that highlight both agency data skip tracing skill and collector communication skill to ensure optimal recoveries.

Coast is utilized by 35 government entities, which includes 230 debt types. Coast currently manages more than 790,000 government accounts worth $19.5 billion for the federal government. Additionally, Coast handles federal government debts and taxpayer receivables of $74M accounts for more than 200 clients.

Coast is proud of its accomplishments.

- Number one PCA on the 2009 United States Department of Education, Federal Student Aid (FSA) Small Business Pool contract
- Current leader on the 2014 FSA contract
- Contract agency on the General Services Administration (GSA) Schedule
- More than 250 years of combined management experience providing collection service to the government entities

Coast has the processes, operations, quality control, technology, security, and financial stability to provide proven and professional debt collection services to DOR.

12.1 Describe the types of managed services capabilities.

Coast provides collection agency services which encompass:

- Inbound and outbound telephone communication with taxpayers
- Inbound and outbound mailed correspondence
- Information gathering (skip tracing)
- Payment processing
- Reporting
- Value-added services (on-site placement assistance and training, industry updates, subject matter experts)
- Reconciliation of accounts

Coast can also provide the following services:

- Call center overflow during tax season
- Flat-fee letter service

13.1 Describe software solutions that will enable DOR to monitor collection activities.

Coast has the ability to provide DOR with VPN access to our collection environment. DOR would have access to collection activity files. Through the VPN, DOR will have access to:

- Coast's collection environment which includes
  - DOR specific collection platform to view accounts, notes, payment activity, balances, and newly added information
  - Call Recordings
- Windows file system (appropriately restricted to DOR files and data)
  - Ability to view files designated to DOR contract
  - Standard and Ad Hoc reports

As a testament to Coast's collection system functionality and a demonstration of experience in the customization of our system to large government clients, Coast has successfully implemented, performed, and secured information provided to Coast by the United States Department of Education. This contract required significant information technology resources and customized collection system requirements. As a result of Coast's demonstrated successful creation of a custom collection environment on prior contracts, Coast is able to successfully onboard and implement the requirements of DOR.

Coast's collection environment, including all system hardware and software, has the ability to accept, accommodate, and transmit data on all accounts. Coast will ensure that our collection system protects from the unauthorized disclosure of DOR's information by partitioning data from other clients, password protecting all data, and making data only accessible to employees who are assigned to this contract and approved by DOR to access such data. Coast will ensure that all data is protected and maintains integrity throughout our collection system.

Coast's collection system will include online access to view the data elements outlined by DOR, and will provide the ability to review account activity and notations. In order to facilitate the transition of services, and to provide transparency of our system, Coast will provide DOR with a list of the abbreviations used in our collection system upon contract award. Additionally, Coast is able to provide DOR with training on how to use our system and will work with our vendor, Ontario Systems, to answer any questions and provide additional training and reference material to DOR as needed.

Account Notation

Coast's Collection Representatives are required to notate all account activity within our collection system including but not limited to the number dialed, information provided to the taxpayer, and the specific details of any payment arrangements. This manual notation is complimented by our system's automatic notation which provides information such as number dialed, time called, and length of call. These notations create a detailed summary of the account activity and provide transparency to DOR. This documentation, along with recorded calls, mailed notices, and correspondence received, create a comprehensive account record and thoroughly detail the information communicated to and from the taxpayer.

Call Recordings

Coast has the capability of recording all calls, where allowed by Federal and state laws and regulations, and will provide call recordings to DOR. This includes storing calls for a minimum of 270 days and the ability to retrieve call recordings for specific debts, representatives, and dates. Additionally, Coast will ensure the safeguarding of all recorded calls in accordance with DOR's Security Requirements, and will provide technical support to assist DOR with any questions or concerns related to accessing Coast's call recordings.

14.1 Are you able to calculate Interest on the tax liability on an ongoing basis or will DOR need to provide updated balances? If so, what frequency would be required? Describe capabilities to calculate interest on the tax liability on an ongoing basis.

Coast is able to accrue interest at the rate and frequency dictated by DOR. For interest bearing accounts, Coast will verify with DOR that our information is in agreement with their system prior to confirming to a taxpayer that the debt has been paid in full.

15.1 Has your solution been utilized by other Governmental Agencies prior? Describe solutions used for Governmental Agencies.

Yes, our solution has been used by other government agencies. Coast is utilized by 35 government entities, which includes 230 debt types. Coast currently manages more than 790,000 government accounts worth $19.5 billion for the federal government.

Coast will customize a complete collection service package that includes a comprehensive program of telephone calls, letters, and extensive skip tracing to meet DOR's needs. Additional detail on our collection process and skip tracing is described in **RFI Question 1.1.**

Coast services the following types of accounts:

Claims and Damage	Interest and Penalties
Code Ordinances	Licenses and Permits
Contracts and Loans	Parking Citations
Court Fines and Fees	Property Damage Claims
Dishonored Checks	Red Light violations
EMS	Restitution
Environmental Services	Sales of Goods/Services
False Alarm	Student Loans
Federal Grants	Surcharges
Fines and Forfeitures	Taxes
General Business Accounts	Utilities
Hospital Receivables	Installment loans

Coast has the processes, operations, quality control, technology, security, and financial stability to provide proven and professional debt collection services to DOR.

16.1 Describe how questions regarding the basis of the tax liability asked by the debtor are handled.

Coast will review its system to best answer questions asked by the taxpayer. Coast will work with DOR on establishing an appropriate training program to ensure that information provided by DOR is accurately communicated to debtors. If DOR provides system access to detailed information, Coast representatives will utilize that access to provide detailed information to taxpayers.

17.1 Describe how settlements presented by taxpayers are handled.

Settlements

Settlement offers will be presented to DOR on a case-by-case basis. For our clients who allow settlements, Coast is often provided with the parameters to accept or decline the offer to reduce the intervention required by the client and to allow for prompt recovery of the amount from the debtor.

Coast representatives are trained to ask for the full amount due, as well as work closely with the taxpayer to explore every possible source of revenue that could aid the taxpayer in meeting their obligation. When these avenues are exhausted, the representatives can offer the taxpayer a settlement amount in compliance with the parameters established by DOR. We understand that settlements will require DOR approval.

18.1 Describe what information DOR should supply for optimal solution performance.

Coast requires that the following information be provided at time of placement:

- Client account/reference number
- Taxpayer name
- Social security number, if available
- Last known address
- Last known phone
- Principal, interest, late fees
- Collection costs, if permitted under debt instrument or state statute
- Total balance
- Email address
- The date of last payment, if any
- The service date
- Date of delinquency

Additional information that is helpful, if available, but is not required, includes: date of birth, information, and employer.

19.1 Describe the process used when receiving information from taxpayers that may change the collection amount. How will the information will be provided to DOR and will DOR be required to provide any additional information.

Based on the contract's specifications and DOR's expectations, Coast will update our system based on new information from taxpayers that result in adjustments to their collection amount. This could occur if the debtor provides updated income information. Unless otherwise requested, all taxpayer driven requests for balance adjustments will be confirmed with DOR before being approved. Coast will utilize approved DOR processes to calculate account adjustments based on circumstances discovered.

Coast utilizes SFTP protocols to provide information to DOR. If DOR prefers, information can be provided by encrypted email, fax, or mail. If DOR provides an SFTP, Coast can automatically upload and download information to expedite the process. Unless prescribed authority is agreed upon, Coast will request DOR to provide approval prior to posting any adjustments to taxpayer accounts.

20.1 Describe account updates would the solution provide to DOR? How would this information be delivered to DOR? What IT considerations/requirements would need to be made by DOR in order to receive this information most efficiently?

If given the opportunity to work with DOR, Coast's IT team would work with DOR to create reports. Coast has provided custom report solutions for clients that include the upload of payment and other data to and the automatic downloading of information from client systems. The Account Executive will work with DOR, the Director of Client Service, and our IT team to develop, test and deliver information that is requested or required. A log of communication from taxpayers can be provided. A point of contact will be provided on all reports. Please see **RFI Question 4.4** for Client Service Contact Information.

Coast has provided our standard Real Time and Ad Hoc Reporting in **1.1**. Additionally, Coast has provided sample reports in **Exhibit II**.

21.1 Describe how the solution will provide remittances to DOR including but not limited to frequency of remittances made and net or gross remittances of funds collected.

Coast can remit funds and statements via paper or electronically to DOR, and at the frequency requested by DOR. We can remit daily, weekly, semi-monthly, or monthly. Remittance of all monies received (in either net or gross depending on DOR's preference), no later than the fifteenth day of each month of all funds collected on a monthly basis; this remittance will be accompanied by an itemized invoice explaining the remittance that includes each taxpayer's name, account number, date and amount of payment.

22.1 Describe what information on the remittances the solution would provide to DOR. Describe the format would this information be provided and what frequency the information would be provided.

Coast's standard Payment Invoices and Remittance Statements itemize payments made and include the debtor name, DOR reference number, payment date and amount, contingency fee, and amount due to DOR. Statements and invoices can be customized to provide any detail required by DOR such as remaining balance or payment distribution. Reports are generated monthly, by the 5th day of the month for the previous month, unless otherwise requested. Frequency of reports can be customized to meet DOR requirements.

Coast provides remittance statement information to our clients in multiple formats, if requested. Statements and invoices are generated in pdf and csv format. Coast also has the ability to provide customized reports in csv or other format as required by DOR.

23.1 Describe other reporting options the solution could provide.

Coast understands the importance of receiving comprehensive and timely reports and is able and willing to comply with any reporting requirements by DOR. Reports can be furnished in any format on a specified schedule.

Coast provides standard reports and can create custom reports specifically for DOR. Coast will comply with DOR reporting requirements and understands the necessity of timely and accurate reporting. Coast will provide the Contracting Officer, or the Contracting Officer's Representative, reports from Coast's collection system in order to demonstrate our compliance with this contract request.

Real-Time and Ad Hoc Reporting

Coast understands the importance of receiving comprehensive and timely reports and is able and willing to comply with any reporting requirements of DOR. Reports can be furnished in hard copy or electronically on a specified schedule. Below is a list of our standard reports along with a description and frequency of each:

Report Name	Description	Standard Frequency
Acknowledgment Report	Acknowledges receipt of listed accounts including principal, fee, and interest amounts	Within 48 hours of account placement, as placements occur.
Account Progress Report	Monthly report of status of listed accounts, including balance, payments , and current status	Monthly, by the 5th day of the Month for the previous month.
Payment Invoice/ Remittance Statement	Monthly invoice shows collections, commissions, net due you, and current balance	Monthly, by the 5th day of the Month for the previous month.
New Address Report	Lists all accounts that have had a name or address change since last reporting period	Monthly, by the 5th day of the Month for the previous month.

Report Name	Description	Standard Frequency
Close and Return Report	List of accounts removed from active status and reason for return	Monthly, by the 5th day of the Month for the previous month.
Placement Analysis Report	Performance analysis based on account placement dates.	Monthly, by the 5th day of the Month for the previous month.

24.1 Provide any additional information that may be beneficial to the State.

Onsite Training

Coast can provide training on various topics, including regulatory change at DOR's offices. We will provide training on our how to use our client website, place files electronically, and retrieve electronic documents from our web folders.

Onsite Placement Assistance

Coast understands the needs of its government clients and the occasional requirement for assistance with onsite placements. Based on your needs, we can provide a qualified staff member who is adept at working with various systems to pull together needed portfolio data for collection referrals.

Periodic Updates

As part of our commitment to ensuring Coast and our clients have the most current information regarding industry and compliance trends, Coast provides our clients with periodic updates via e-mail. These updates include information about general compliance topics and breaking information that impact our industry.

Subject Matter Experts

As part of Coast's commitment to excellence, we routinely seek the best and brightest candidates to fill staffing needs. As a result, we are proud to have staff members available to clients who are subject matter experts in government collections. Our experts are available to answer questions regarding general collection and compliance related questions regardless of whether or not a particular obligation has been placed with our office for collections. We believe this provides our clients with even greater value. We encourage our clients to use us as a knowledge resource.

Giving Back

Coast is proud that its employees support our industry and our community by giving back. Coast employees vote on charities to work for each year in our Louisiana and New York locations. Our staff supports their choices by giving their own time to help, raise funds, and contribute their own dollars. Over the last two years, Coast has donated to:

- American Cancer Society
- ARMing Heroes, a charity specific to the Accounts Receivable industry that is dedicated to making sure veterans get the help they have earned through a variety of program
- Family Promise, which assists homeless children and their families experiencing homelessness by providing shelter, meals, and support services
- Geneseo Fire Department (New York)
- Humane Society Adoption Center
- Louisiana Baptist Children's Home
- March of Dimes
- MedCamps, a summer camp for severely disabled and ill children
- Northeastern Louisiana "Wish I Could" Foundation
- Susan G. Komen Race for the Cure

Dress Down for Charity Program

In 2012, Coast's Board of Directors established a companywide Dress Down for Charity program where employees donate $20 per month for the option to wear jeans and sneakers throughout the week. In addition to the money raised by staff, Coast donates $500 per participating office per month. Coast employees nominate local organizations every other month that they would like to receive the donations and then our staff vote on the top three nominated organizations. The program was designed to further establish a sense of charity throughout Coast and make a positive impact in the local communities that Coast is part of. In 2019, Coast generated over $200,000 in charitable donations.

Coast Cares' Education Open

In 2019, Coast established Coast Cares, an employee driven group dedicated to serving the local communities in which we live and work. In August of 2019, Coast sponsored the 1st Annual Coast Cares' Education Open, a golf tournament which raised funds to support underprivileged children in four (4) school districts in Livingston County, NY. Coast selected the districts based on a census of where our employees live and send their children to school. With the combination of the Dress Down for Charity Program and the Education Open, Coast raised over $41,000 that was split equally between the four (4) districts. Coast will host this annual event as part of our mission to give back to both our community and the families of our employees.

Volunteering

We also understand how important time can be to community organizations. Our employees and management provide volunteer services to the following organizations in their local communities:

- Boys & Girls Club
- Children & Youth Sports (as coaches and sponsors)
- Fellowship of Christian Students (FCS coaching)
- Refuge Temple Ministry
- Regional Food Banks

FORM A VENDOR CONTACT SHEET

Form A should be completed and submitted with each response to this solicitation document. This is intended to provide the State with information on the vendor's name and address, and the specific persons who are responsible for preparation of the vendor's response.

Coast has read, understands, and has complied. Coast has provided a completed Vendor Contact Sheet on the following page.

Form A

Vendor Contact Sheet

Request for Information Number DOR-01282020

Form A should be completed and submitted with each response to this solicitation document. This is intended to provide the State with information on the vendor's name and address, and the specific persons who are responsible for preparation of the vendor's response.

Preparation of Response Contact Information	
Vendor Name:	Coast Professional, Inc.
Vendor Address:	4273 Volunteer Road Geneseo, NY 14454
Contact Person & Title:	Diana Day, National Account Executive
E-mail Address:	proposals@coastprofessional.com
Telephone Number (Office):	(585) 991-5259
Telephone Number (Cellular):	(585) 667-2906
Fax Number:	(866) 682-1915

Each vendor shall also designate a specific contact person who will be responsible for responding to the State if any clarifications of the vendor's response should become necessary. This will also be the person who the State contacts to set up a presentation/demonstration, if required.

Communication with the State Contact Information	
Vendor Name:	Coast Professional, Inc.
Vendor Address:	4273 Volunteer Road Geneseo, NY 14454
Contact Person & Title:	Brooke Singletary
E-mail Address:	contracts@coastprofessional.com
Telephone Number (Office):	(585) 991-5259
Telephone Number (Cellular):	(318) 307-9856
Fax Number:	(866) 682-1915

EXHIBIT I. INFORMATION SECURITY PLAN

Coast Professional, Inc.

Information Security Plan

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DATA SECURITY

Coast recognizes the importance of protecting our client, consumer, and company data to the highest standard and has created a data security plan and infrastructure to ensure the continued safety of this information. Our production, support, and systems' facilities are under a 24/7/365 monitored alarm, electronically monitored and controlled access card system, physically locked door areas, and stringent security password and access policies. Our database hardware is housed in a locking rack chassis located within a further access controlled restricted entry data center. Coast contracts for onsite shredding and destruction of all documents containing confidential borrower information and other sensitive documents. Access control to the software and hardware is only permitted by authorized personnel under rigorous physical, software, and password protection. All staff are required to complete regular security awareness training including facility, data access, and document control, as well as all other federal security requirements, specifically including the Gramm Leach Bliley Act (GLBA) concerning privacy.

All Coast employees working on our system and network are issued unique user IDs and passwords that safeguard passage within Coast's Ontario Systems, LLC (OS) FACS database server. Coast's strict protocols and procedures have been designed, developed, and tested to protect internal data in the event of a cyber or other potential data security breach. In addition, internal and external physical and facility access and control are maintained through layers of right to use parameters at multiple levels of our hardware, software, network, data center and production areas.

Documentation of Accounts

Representatives document every account on Coast's system when receiving written and/or verbal communication. Notes in account history provide backup conversations and proof that the Mini-Miranda was cited. Internally, managers may also view account documentation to assure proper procedures are followed. In addition, cashiers use system documentation to certify payment arrangements prior to posting. Coast does NOT outsource any data processing.

To protect data, accessibility to menu features is allowed only by authorized personnel. Passwords are changed frequently to protect the integrity of the system. Passwords are a combination of alpha/numeric keys and cannot be reused. With assignment of password and PIN access and levels of access granted on a need-for-access basis, anyone who logs in is recorded and tracked by keystroke.

Coast grants our clients unprecedented fully transparent access to ALL of their accounts maintained in our system. Clients who have been assigned the proper credentials and who have been trained on our system may make changes to their accounts. This makes it absolutely critical to identify each and every person who has accessed the online system at any point and what changes or entries they have made. All information is backed up on a regular basis. Each employee and every client has a unique user ID and personal password. Coast understands the importance of safeguarding the University's student borrower's information in order to comply with the Family Education Rights and Privacy Act (FERPA) and the Gramm Leach Bliley Act (GLBA).

COMPLIANCE WITH REGULATIONS

Gramm Leach Bliley Act

Coast Information Security Plan ("Plan") describes Coast's safeguards to protect information and data in compliance ("Protected Information") with the Financial Services Modernization Act of 1999, also known as the Gramm-Leach-Bliley Act, 15 U.S.C. Section 6801. These safeguards are provided to:

- Protect the security and confidentiality of Protected Information
- Protect against anticipated threats or hazards to the security or integrity of such information
- Protect against unauthorized access to or use of Protected Information that could result in substantial harm or inconvenience to any customer
- This Information Security Plan also provides for mechanisms to:
    - Identify and assess the risks that may threaten Protected Information maintained by Coast
    - Designate employees responsible for coordinating the program
    - Design and implement a Safeguards program
    - Manage the selection of appropriate service providers
    - Adjust the plan to reflect changes in technology, the sensitivity of Protected Information, and internal or external threats to information security
    - Reference related policies, standards, and guidelines

Identification and Assessment of Risks to Customer Information: Coast recognizes that it has both internal and external risks. These risks include, but are not limited to:

- Unauthorized access of Protected Information by someone other than the owner of the covered data and information
- Compromised system security as a result of system access by an unauthorized person
- Interception of data during transmission
- Loss of data integrity
- Physical loss of data in a disaster
- Errors introduced into the system
- Corruption of data or systems
- Unauthorized access of covered data and information by employees
- Unauthorized requests for covered data and information
- Unauthorized access through hardcopy files or reports
- Unauthorized transfer of covered data and information through third parties

Coast recognizes that this may not be a complete list of the risks associated with the protection of Protected Information. Since technology growth is not static, new risks are created regularly. Accordingly, the Information Systems Department will actively participate and coordinate our staff at all levels to identify new risks. Coast believes current safeguards used by the Information Systems Department are reasonable and in light of current risk assessments are sufficient to provide security and confidentiality to Protected Information maintained in our systems.

Information Security Plan Coordinators: Coast's Information Systems Team, coupled with Coast Administration, is the coordinator of this Plan. The Information Systems Team will include representatives from the departments primarily responsible for safeguarding Protected Information. Each department responsible for safeguarding Protected Information will provide an annual update report indicating the status of its safeguarding procedures. Administration, in conjunction with the Information Systems Team, are responsible for assessing the risks associated with unauthorized transfers of Protected Information and implementing procedures to minimize those risks that are appropriate based upon the size, complexity, and the nature and scope of its activities.

Design and Implementation of Safeguards Program:

- **Employee Management and Training:** In accordance with Coast's policies, standards, and guidelines, reference checking and background reviews will be conducted when deemed appropriate. During employee orientation, every new employee in departments that handle Protected Information will receive training on the importance of maintaining the confidentiality of Protected Information. Every employee will also be trained in the proper use of computer information and passwords. Each department responsible for maintaining Protected Information will provide ongoing updates to its staff. These training protocols are designed to help minimize risk and safeguard covered data and information security.
- **Physical Security:** Coast has addressed the physical security of Protected Information by limiting access to only those employees who have a business reason to know such information and requiring signed acknowledgement of the requirement to keep Protected Information private. Existing policies establish a procedure for the prompt reporting of the loss or theft of Protected Information. Offices and storage facilities that maintain Protected Information limit unauthorized access and are appropriately secured. Paper documents that contain Protected Information are shredded before disposal.
- **Information Systems:** Information systems include network and software design as well as information processing, storage, transmission, retrieval, and disposal. Coast has in place, standards and guidelines governing the use of electronic resources including firewall and wireless access and use policies. Coast will take reasonable and appropriate steps consistent with current technological developments to make sure that all Protected Information is secure and to safeguard the integrity of records in storage.

Red Flags Rule Compliance

The Fair Trade Commission Red Flags Rule, Appendix J to Part 681, Interagency Guidelines on Identity Theft Detection Prevention and Mitigation require each financial institution and creditor who maintains one or more covered accounts, as defined in Sec. 681(2) b) (3) of this part to develop and provide for the continued administration of a written Program to detect, prevent and mitigate identity theft in connection with the opening of a covered account or any existing covered account.

I. Coast has identified relevant Red Flags in reference to our client's accounts, which include but may not be limited to:

- Risk Factors
  - The types of covered accounts any institution of higher education offers or maintains which includes but is not limited to, Perkins Loans, institutional loans and any account which requires a monthly payment plan to pay it in full
  - The methods provided to access covered accounts
- Sources of Red Flags
  - Incidents of identity theft that the financial institution has experienced
  - Methods of identity theft that the financial institution has identified that may impact changes in identity theft risk
  - Applicable information and guidance received from our clients regarding their identity theft policies and procedures

II. Categories of Red Flags

- Alerts, notification or other warnings received from consumer reporting agencies, service providers or affected institutions of higher education that are Coast clients.
- Presentation of suspicious documents
- Presentation of suspicious personal identifying information, such as suspicious address change.
- Notice from clients, victims of identity theft, law enforcement authorities or other authority in connection with covered accounts held by the institution of higher education.

III. Detection of Red Flags

Coast's policies and procedures to protect covered accounts address include but are not limited to:

- Obtaining, identifying information about, and verifying the identity of, a person using a covered account or making payment on a covered account, using the Customer Identification Rules set forth in 31 U.S.C 5318(1) (31 CRF 103.121).
- Authenticating borrowers and debtors, clients and internal users of Coast systems. Coast monitors transactions at all times, which may include recording telephone calls where permitted by law and access to any facet of our on line system. Access is only by PIN and password and this

information is regularly reviewed for anomalies or suspicious activity. Users are deleted when their on line access is revoked or dormant.

IV. Preventing and Mitigating Identity Theft

Coast's policies and procedures provide appropriate responses to Red Flags when they are detected or when we are advised, by a client, of their occurrence. In determining an appropriate response, Coast will refer to both our internal security protocols, which are covered under the Gramm-Leach-Bliley Act (GLBA), and our Employee Access Policies. GLBA compliance is under the direction of Coast's Information Systems Manager. Employee Access Policies are also maintained under the direction of Coast's Information Systems Manager.

Our employee access policies include but are not limited to:

- Password Protection on all computers and on all computer systems used by Coast.
- Access to any systems is on a need to know basis.
- All visitors to Coast facilities must be signed in and escorted during the time they are in the facility.
- Personally identifiable information is cross cut shredded immediately after use.
- Any documents maintained by Coast on behalf of Clients are maintained in locked, fireproof cabinets.
- Our FACS system servers are in a locked room with limited access. Servers are accessible only by PIN and Password to IT personnel and executive management

Coast does not use social security numbers in any mailed, faxed or emailed communication unless such communication is encrypted and sent via specific security protocols electronically and only with the consent of our clients.

V. Updating the Program

In addition to adhering to the Red Flags Rule, Coast protects client information under the Gramm-Leach-Bliley Act (GLBA), FERPA and the Fair Credit Reporting Act (FCRA).

Health Insurance Portability and Accountability Act (HIPAA)

Coast Professional, Inc. complies with all regulations and requirements of the Health Insurance Portability and Accountability Act (HIPAA).

Additional Regulations

In addition to all of the security measures in place, Coast Professional undergoes annual third-party audits that validate our compliance with PCI-DSS, FISMA, ISO 27002, and many different state regulations and laws such as the Massachusetts Standards for the Protection of Personal Information of Residents of the Commonwealth (Mass CMR 17.00), the Minnesota Plastic Card Security Act (MN PCA), and the Nevada Personal Information Law (NRS 603a).

DISASTER RECOVERY & CYBER INCIDENT PREVENTION

Coast has a well-developed disaster recovery plan with a documented strategy to insure continued operations in the event of a disaster. Coast has an emergency toll-free line for employees to retrieve updated information regarding their status. This emergency line notifies the disaster recovery team and key personnel that the disaster recovery plan has been implemented and that they are to report to the designated location to continue vital operations for the company.

Because Coast maintains facilities and satellite offices in different regions of the United States, key personnel will be able to promptly notify clients via e-mail or by the means specified in the client's contract with Coast of any information that may impact their information or our ability to perform under our client contracts during a period of disaster.

Coast's Disaster Recovery, Business Continuity and Cyber Incident Prevention and Reporting plans are designed to identify the strategies, resources, and actions necessary to resume essential business functions for critical operational units (departments) in the event of an unplanned disaster, loss of facility, or breach of data security protocols. The plans below have been developed, documented, and exercised to ensure a full business and system recovery including implementation, a course of action, and contingency planning.

- A secondary recovery site – We have designated our Geneseo, NY facility as our recovery site
- Real time recovery processes and hardware built for critical applications and servers
- A telecommunication strategy devised to switch both voice and data
- Building management conducts semi-annual testing on building evacuations, emergencies, security awareness, and business resumption and system readiness procedures.

Our Contingency Planning program includes plan development, plan maintenance, and project management.

Plan Development: Coast's Plan Development includes plan creation by the corporate disaster (system or facility) recovery coordinator with assistance from each business unit's Disaster Recovery Coordinator and the Executive Management Team. Each plan's content summary includes the following elements:

Processes	Documents	Reporting Structure
Call Lists	Employees	Customers
Equipment	Vendors	Telecommunications
Vital Records	Supplies	Networking
Procedures	Work Stations	
Simulated Testing	Software	

Plan Maintenance: Coast's Plan Maintenance consists of ongoing maintenance and enhancement activities including at least two (2) exercises per business unit per year. Corporate Disaster Recovery Coordinators and each business Unit's recovery team conduct their exercises and make modifications to their plans between exercises.

Project Management: Coast's Project Management involves comprehensive project management assistance during the initial and subsequent plan maintenance phases of the project. The business unit head(s) are responsible for the signoffs on acknowledged and completed disaster recovery and security plans. Administrative review and approval is required on all changes or enhancements on contingency plans.

Cyber Incident Prevention and Reporting Program: Coast's Cyber Incident Prevention and Reporting Program incorporate through prevention warning and response program protocols, coordinated by our Information Systems Manager throughout all business units. These proactive processes are designed around detection and treatment of potential cyber security attempts or incidents. These incidents include internal or external successful or unsuccessful access attempts and unauthorized use, virus or Trojan horse, or malicious code infection, or any other intentional or unintentional access, control, or loss of data.

All systems –detected or employee-reported events are intensively investigated and corrective measures and procedures are initiated immediately to protect data integrity, confidentiality, hardware, software, and overall secure operational readiness. **If an event occurred, Coast would immediately inform all clients of the nature of a successful or unsuccessful breach of security.** All records of such incidents are maintained in Coast's Information Systems (IS) area.

Coast's management team and staff are all committed to maintaining and improving comprehensive Disaster Recovery, Business Continuity Planning and Cyber Incident Prevention and Reporting. The recovery plans are workable documents designed to provide immediate response to and subsequent recovery from any unplanned business interruption or breach. The following list covers the type of unplanned business disruptions:

Agency only or Cyber Incident	City-wide business
Building only	Regional
Business district	

Coast completes disaster recovery, business continuity, and cyber incident prevention reports testing on a bi-annual basis. Our procedures' manuals are stored in two (2) different locations. Our test results are maintained by Human Resources and the Information Systems Manager.

Our operating system and database hard drives and backups are layered in order to best secure our client's information from potential disasters, security breach attempts and/or hardware or software failures. Redundant Array of Independent Disks (RAID) redundancy coupled with real-time file journaling ensures restoring capabilities to the last activity entered into the system prior to a failure of one or all systems. Furthermore, Ontario Systems, LLC provides a 24 hour dedicated service to assist with application support to assist in recovery in the event of a system failure. Cisco Systems. provides 24 hour hardware support through an enterprise level multi-year onsite support contract that is currently in place.

EXHIBIT II. SAMPLE REPORTS

COAST
PROFESSIONAL, INC.

ATTN: CLIENT CONTACT
SAMPLE CLIENT
123 MAIN STREET
ANYWHERE US 97216

CLIENT NUMBER:

ACKNOWLEDGMENT OF 02/11/2019

Thank you for listing the following accounts with Coast Professional, Inc. As always, your business is greatly appreciated and your accounts will be handled according to the terms and conditions of your contractual agreement.

Please note that the total includes only the amount placed for each borrower and does not include Coast's collection costs.

This list was checked and approved by:_____

ACCOUNT#	BALANCE	NAME	YOUR ACCOUNT NUMBER
1299898	1500.00	HOBBIT,JACK	123456
PR: 1500.00 INT: 0 LF: 0 CC: 0.00			
TOTALS	1500.00	.1 ACCOUNT	

ADDRESS CORRECTION REPORT 6/1/2019
SAMPLE CLIENT Contact Person: SAMPLE

CLIENT	REFERENCE #	LAST NAME	FIRST NAME	DATE LISTED	NEW ADDRESS 1	NEW ADDRESS 2	SOC SEC NUM	NEW CITY	NEW STATE	NEW ZIP CODE	NEW PHONE	AUDIT STAMP DATE
DUMMI1	XXXXXXX XXXXX	SAMPLE	MIGUEL A	11/21/2018	123 SAMPLE DRIVE	UNIT 1A	XXX-XX-9344	TESTING	CA	12345	012-345-6789	04/29/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	JOSEPH C	01/22/2019	PO BOX 1234		XXX-XX-3455	SAMPLE CITY	CA	123456789	987-654-3210	04/04/2019
DUMMP2	XXXXXXX XXXXX	SAMPLE	OLAMIDE M	03/18/2019	1234 TEST STREET, APT 1		XXX-XX-0094	TESTING	NY	12345	012-345-6789	04/15/2019
DUMMP2	XXXXXXX XXXXX	SAMPLE	CYNTHIA L	04/22/2019	123 SAMPLE DRIVE	160	XXX-XX-4638	SAMPLE CITY	CA	01234	987-654-3210	04/23/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	COLLIN	04/22/2019	PO BOX 1234		XXX-XX-5049	TESTING	CA	01234	012-345-6789	04/23/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	BRIDGET G	04/22/2019	1234 TEST STREET, APT 1		XXX-XX-3834	SAMPLE CITY	CA	012345678	987-654-3210	04/23/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	ANDREA	04/22/2019	123 SAMPLE DRIVE		XXX-XX-6348	TESTING	CA	012345678	012-345-6789	04/23/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	RAUL	01/22/2019	PO BOX 1234		XXX-XX-5220	TESTING	CA	12345	987-654-3210	04/10/2019
DUMMP2	XXXXXXX XXXXX	SAMPLE	RAUL	01/22/2019	123 SAMPLE DRIVE		XXX-XX-5220	SAMPLE CITY	CA	123456789	012-345-6789	04/10/2019
DUMMP2	XXXXXXX XXXXX	SAMPLE	JOSEPH C	01/22/2019	PO BOX 1234		XXX-XX-3455	TESTING	CA	12345	987-654-3210	04/04/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	RANDALL T	02/18/2019	1234 TEST STREET, APT 1		XXX-XX-8866	SAMPLE CITY	CA	01234	012-345-6789	04/10/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	NHAN T	02/18/2019	123 SAMPLE DRIVE	APT B	XXX-XX-2433	TESTING	CA	01234	987-654-3210	04/22/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	SIONE P	02/18/2019	PO BOX 1234		XXX-XX-6939	SAMPLE CITY	CA	012345678	012-345-6789	04/10/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	DANIEL L	02/18/2019	1234 TEST STREET, APT 1	74	XXX-XX-4123	TESTING	CA	012345678	987-654-3210	04/22/2019
DUMMP2	XXXXXXX XXXXX	SAMPLE	CHLOE	02/18/2019	123 SAMPLE DRIVE		XXX-XX-8149	SAMPLE CITY	CA	12345	012-345-6789	04/05/2019
DUMMP2	XXXXXXX XXXXX	SAMPLE	KAYLAN	02/18/2019	PO BOX 1234	APT 2	XXX-XX-0311	SAMPLE CITY	CA	123456789	987-654-3210	04/22/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	YON S	02/18/2019	1234 TEST STREET, APT 1	APT 108	XXX-XX-9147	TESTING	CA	12345	012-345-6789	04/11/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	ELI	04/22/2019	123 SAMPLE DRIVE		XXX-XX-0696	SAMPLE CITY	TN	01234	987-654-3210	04/23/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	ANGELO A	04/22/2019	PO BOX 1234		XXX-XX-9620	TESTING	CA	01234	012-345-6789	04/23/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	MICHELLE B	04/22/2019	1234 TEST STREET, APT 1		XXX-XX-6552	SAMPLE CITY	SC	012345678	987-654-3210	04/23/2019
DUMMP2	XXXXXXX XXXXX	SAMPLE	NANCY	04/22/2019	123 SAMPLE DRIVE	AVE APT 7	XXX-XX-4188	TESTING	CA	012345678	012-345-6789	04/23/2019
DUMMP2	XXXXXXX XXXXX	SAMPLE	HEATH	04/22/2019	PO BOX 1234	L	XXX-XX-9035	SAMPLE CITY	WA	12345	987-654-3210	04/23/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	DUNG T	04/22/2019	1234 TEST STREET, APT 1	PT 625	XXX-XX-6578	TESTING	IL	123456789	012-345-6789	04/23/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	LAN	04/22/2019	123 SAMPLE DRIVE		XXX-XX-7835	SAMPLE CITY	CA	12345	987-654-3210	04/23/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	HERBERT	04/22/2019	PO BOX 1234		XXX-XX-3456	TESTING	AZ	01234	012-345-6789	04/23/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	ERNEST	04/22/2019	1234 TEST STREET, APT 1	DR	XXX-XX-1176	SAMPLE CITY	FL	01234	987-654-3210	04/23/2019
DUMMP2	XXXXXXX XXXXX	SAMPLE	CYNTHIA D	04/22/2019	123 SAMPLE DRIVE	VD APT 88	XXX-XX-1587	TESTING	CA	012345678	012-345-6789	04/23/2019
DUMMP2	XXXXXXX XXXXX	SAMPLE	ANGEL	04/22/2019	PO BOX 1234	R	XXX-XX-6733	SAMPLE CITY	TX	012345678	987-654-3210	04/23/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	ANTHONY C	04/22/2019	1234 TEST STREET, APT 1		XXX-XX-1049	TESTING	CA	12345	012-345-6789	04/23/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	SALVADOR	04/22/2019	123 SAMPLE DRIVE		XXX-XX-3138	SAMPLE CITY	AZ	123456789	987-654-3210	04/23/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	EVA	04/22/2019	PO BOX 1234	501	XXX-XX-6573	TESTING	CA	12345	012-345-6789	04/23/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	DANIEL K	04/22/2019	1234 TEST STREET, APT 1		XXX-XX-5770	SAMPLE CITY	CA	01234	987-654-3210	04/23/2019
DUMMP2	XXXXXXX XXXXX	SAMPLE	KALLI J	04/22/2019	123 SAMPLE DRIVE		XXX-XX-4089	TESTING	CO	01234	012-345-6789	04/23/2019
DUMMP2	XXXXXXX XXXXX	SAMPLE	JOHN	04/22/2019	PO BOX 1234		XXX-XX-0719	SAMPLE CITY	KS	012345678	987-654-3210	04/23/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	LENNON M	04/22/2019	1234 TEST STREET, APT 1		XXX-XX-0884	TESTING	CA	012345678	012-345-6789	04/23/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	CALEB	04/22/2019	123 SAMPLE DRIVE		XXX-XX-9210	SAMPLE CITY	CA	12345	987-654-3210	04/23/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	JOHN	04/22/2019	PO BOX 1234		XXX-XX-0076	TESTING	CA	123456789	012-345-6789	04/23/2019
DUMMI1	XXXXXXX XXXXX	SAMPLE	KATHY L	04/22/2019	1234 TEST STREET, APT 1	T 4	XXX-XX-0958	SAMPLE CITY	CA	12345	987-654-3210	04/23/2019
DUMMP2	XXXXXXX XXXXX	SAMPLE	DAMEN A	04/22/2019	123 SAMPLE DRIVE	E	XXX-XX-6251	TESTING	NY	01234	012-345-6789	04/23/2019

CLOSED ACCOUNT REPORT **6/01/2019**
SAMPLE CLIENT **Contact Person: SAMPLE**

CLIENT	REFERENCE #	LAST NAME	FIRST NAME	DATE LISTED	AMT CANCELLED	CANCEL DESCRIPTION	ACCOUNT NUM	DATE CLOSED
DUMMI1	XXXXXXX XXXXXX	SAMPLE	DUNG	04/19/2018	5556.51	EXCEEDS RETEN. LIMIT	1436364	4/30/2019 12:00:00 AM
DUMMI1	XXXXXXX XXXXXX	SAMPLE	JI M	04/19/2018	3019.48	EXCEEDS RETEN. LIMIT	1436374	4/30/2019 12:00:00 AM
DUMMI1	XXXXXXX XXXXXX	SAMPLE	BRITTANY N	11/21/2018	0	PAID IN FULL	1491219	4/19/2019 12:00:00 AM
DUMMI1	XXXXXXX XXXXXX	SAMPLE	LYNN Y	02/18/2019	0	PAID IN FULL	1531671	4/8/2019 12:00:00 AM
DUMMI1	XXXXXXX XXXXXX	SAMPLE	RIVER A	04/22/2019	8545.31	PAST STATUTE	1558019	4/30/2019 12:00:00 AM
DUMMP2	XXXXXXX XXXXXX	SAMPLE	CHRISTOPHER R	04/22/2019	3940.91	PAST STATUTE	1558087	4/30/2019 12:00:00 AM
DUMMP2	XXXXXXX XXXXXX	SAMPLE	MICHAEL F	04/22/2019	7683.97	ASSIGNED IN ERROR	1558098	4/30/2019 12:00:00 AM
DUMMPY	XXXXXXX XXXXXX	SAMPLE	KASSEM	04/22/2019	15113.49	PAST STATUTE	1558103	4/30/2019 12:00:00 AM
DUMMP2	XXXXXXX XXXXXX	SAMPLE	BRIDGET G	04/22/2019	12190.89	PAST STATUTE	1558269	4/30/2019 12:00:00 AM
DUMMI1	XXXXXXX XXXXXX	SAMPLE	RACHEL A	04/22/2019	2692.74	PAST STATUTE	1558328	4/30/2019 12:00:00 AM
DUMMI1	XXXXXXX XXXXXX	SAMPLE	NIRVANA	04/22/2019	1967.92	PAST STATUTE	1558336	4/30/2019 12:00:00 AM
DUMMI1	XXXXXXX XXXXXX	SAMPLE	ETHAN A	04/22/2019	886.56	PAST STATUTE	1558340	4/30/2019 12:00:00 AM
DUMMI1	XXXXXXX XXXXXX	SAMPLE	MICHAEL	04/22/2019	882.67	PAST STATUTE	1558350	4/30/2019 12:00:00 AM
DUMMI1	XXXXXXX XXXXXX	SAMPLE	LOVEISHA R	04/22/2019	4663.43	PAST STATUTE	1558367	4/30/2019 12:00:00 AM
DUMMP2	XXXXXXX XXXXXX	SAMPLE	JULIANA C	04/22/2019	2550.45	CLIENT REQUEST CLOSE	1558411	4/30/2019 12:00:00 AM
DUMMP2	XXXXXXX XXXXXX	SAMPLE	PAIGE L	04/19/2018	997.75	EXCEEDS RETEN. LIMIT	1436352	4/30/2019 12:00:00 AM
DUMMPY	XXXXXXX XXXXXX	SAMPLE	MINDI J	04/19/2018	1727.51	EXCEEDS RETEN. LIMIT	1436353	4/30/2019 12:00:00 AM
DUMMP2	XXXXXXX XXXXXX	SAMPLE	CYNTHIA V	04/19/2018	2070.89	EXCEEDS RETEN. LIMIT	1436355	4/30/2019 12:00:00 AM
DUMMI1	XXXXXXX XXXXXX	SAMPLE	NYAN B	04/19/2018	1876.94	EXCEEDS RETEN. LIMIT	1436356	4/30/2019 12:00:00 AM
DUMMI1	XXXXXXX XXXXXX	SAMPLE	NEGAR	04/19/2018	6204.61	EXCEEDS RETEN. LIMIT	1436360	4/30/2019 12:00:00 AM
DUMMI1	XXXXXXX XXXXXX	SAMPLE	KAYSI L	04/19/2018	766.56	EXCEEDS RETEN. LIMIT	1436365	4/30/2019 12:00:00 AM
DUMMI1	XXXXXXX XXXXXX	SAMPLE	MIGUEL A	04/19/2018	1082.68	EXCEEDS RETEN. LIMIT	1436367	4/30/2019 12:00:00 AM
DUMMI1	XXXXXXX XXXXXX	SAMPLE	JOHN A	04/19/2018	5672.85	EXCEEDS RETEN. LIMIT	1436368	4/30/2019 12:00:00 AM
DUMMP2	XXXXXXX XXXXXX	SAMPLE	ALFONSO	04/19/2018	1787.6	EXCEEDS RETEN. LIMIT	1436375	4/30/2019 12:00:00 AM
DUMMP2	XXXXXXX XXXXXX	SAMPLE	ROBERTO J	04/19/2018	936.15	EXCEEDS RETEN. LIMIT	1436376	4/30/2019 12:00:00 AM
DUMMPY	XXXXXXX XXXXXX	SAMPLE	ALBERT E	04/19/2018	1984.4	EXCEEDS RETEN. LIMIT	1436377	4/30/2019 12:00:00 AM
DUMMP2	XXXXXXX XXXXXX	SAMPLE	LINDA M	04/19/2018	4375.31	EXCEEDS RETEN. LIMIT	1436378	4/30/2019 12:00:00 AM
DUMMI1	XXXXXXX XXXXXX	SAMPLE	TAYLOR R	05/31/2018	0	PAID IN FULL	1452835	4/19/2019 12:00:00 AM
DUMMI1	XXXXXXX XXXXXX	SAMPLE	EDWARD O	02/18/2019	6872.48	DECEASED	1531599	4/30/2019 12:00:00 AM
DUMMI1	XXXXXXX XXXXXX	SAMPLE	LUKE W	04/19/2018	5091.1	EXCEEDS RETEN. LIMIT	1436366	4/30/2019 12:00:00 AM
DUMMI1	XXXXXXX XXXXXX	SAMPLE	JULIE A	04/19/2018	3225.3	EXCEEDS RETEN. LIMIT	1436372	4/30/2019 12:00:00 AM
DUMMI1	XXXXXXX XXXXXX	SAMPLE	JU Y	02/18/2019	0	PAID IN FULL	1531655	4/24/2019 12:00:00 AM

TOTAL NUMBER OF ACCOUNTS: 32
TOTAL AMOUNT ON THESE ACCOUNTS: $ 114366.46

PROGRESS REPORT 6/01/2019
SAMPLE CLIENT Contact Person: NAME

CLIENT REFERENCE #	LAST NAME	FIRST NAME	DATE LISTED	INITIAL BALANCE	LAST PAYMENT	TOTAL PAID	ACCOUNT BALANCE	# CALLS	# LETTERS	ACCOUNT STATUS
DUMMP2 XXXXXXXXX XX	SAMPLE	GWENDOLYN	12/21/2017	994.97	04/01/2019	700.00	555.71	40	7	REHABS
DUMMP2 XXXXXXXXX XX	SAMPLE	LUARA S	05/31/2018	5421.31		0.00	6893.23	97	5	LOAN CON ELIGIBLE
DUMMP2 XXXXXXXXX XX	SAMPLE	VICKY	05/31/2018	2569.25		0.00	3266.59	76	6	LOAN CON ELIGIBLE
DUMMP2 XXXXXXXXX XX	SAMPLE	DANIEL C	06/19/2018	1000.41		0.00	1269.99	32	5	LOAN CON ELIGIBLE
DUMMP2 XXXXXXXXX XX	SAMPLE	LARISSA	06/19/2018	2803.67		0.00	3560.70	50	4	LOAN CON ELIGIBLE
DUMMP2 XXXXXXXXX XX	SAMPLE	SELENE	06/19/2018	1471.49		0.00	1868.57	20	1	LOAN CON ELIGIBLE
DUMMP2 XXXXXXXXX XX	SAMPLE	TAYLOR D	07/13/2018	4259.44	04/29/2019	1400.51	3973.79	16	1	ATTORNEY REPRESENTED
DUMMP2 XXXXXXXXX XX	SAMPLE	ASHLEIGH N	08/21/2018	2155.62		0.00	2712.16	51	5	LOAN CON ELIGIBLE
DUMMP2 XXXXXXXXX XX	SAMPLE	NASHWAN M	09/21/2018	1788.40		0.00	2243.73	35	2	LOAN CON ELIGIBLE
DUMMP2 XXXXXXXXX XX	SAMPLE	SEAN B	09/21/2018	1276.76	02/21/2019	532.00	1074.46	43	2	LOAN CON ELIGIBLE
DUMMP2 XXXXXXXXX XX	SAMPLE	SARAH A	09/21/2018	3936.29		0.00	4937.80	48	4	LOAN CON ELIGIBLE
DUMMP2 XXXXXXXXX XX	SAMPLE	NICOLE M	10/23/2018	856.06		0.00	1069.33	7	2	NON-ELIGIBLE LOAN
DUMMP2 XXXXXXXXX XX	SAMPLE	CHRISANDRA A	10/23/2018	5568.47		0.00	6958.74	86	4	LOAN CON ELIGIBLE
DUMMP2 XXXXXXXXX XX	SAMPLE	MIGUEL A	11/21/2018	6562.65		0.00	8154.18	93	4	RES PEN FROM CLIENT
DUMMP2 XXXXXXXXX XX	SAMPLE	VANESSA	11/21/2018	361.15		0.00	449.34	1	1	OPEN ACCOUNT
DUMMP2 XXXXXXXXX XX	SAMPLE	GISELL	12/21/2018	1049.01		0.00	960.79	22	1	LOAN CON ELIGIBLE
DUMMP2 XXXXXXXXX XX	SAMPLE	SHELLINA L	12/21/2018	467.80		0.00	580.00	7	1	OPEN ACCOUNT
DUMMP2 XXXXXXXXX XX	SAMPLE	KELLY A	12/21/2018	1461.91		0.00	1812.94	12	2	CNSL PEND 45-90 DAYS
DUMMP2 XXXXXXXXX XX	SAMPLE	LESLIE D	01/22/2019	3718.00		0.00	4158.61	37	2	LOAN CON ELIGIBLE
DUMMP2 XXXXXXXXX XX	SAMPLE	KIMBERLY A	03/18/2019	4942.28		0.00	6060.95	25	2	LOAN CON ELIGIBLE
DUMMP2 XXXXXXXXX XX	SAMPLE	EUGENE K	03/18/2019	769.13		0.00	941.09	0	1	PHASE TWO COLLECTION
DUMMP2 XXXXXXXXX XX	SAMPLE	JUSTIN J	03/18/2019	1628.89		0.00	1997.54	4	1	CREDIT REPORTS-RUN
DUMMP2 XXXXXXXXX XX	SAMPLE	STEFAN	04/22/2019	2509.00		0.00	3062.96	2	1	CREDIT REPORTS-RUN
DUMMP2 XXXXXXXXX XX	SAMPLE	CHRISTOPHER J	06/19/2018	3820.80		0.00	3964.32	66	3	EXPERIAN TRIGGER HIT
DUMMP2 XXXXXXXXX XX	SAMPLE	MARIANNE M	07/19/2018	4517.17		0.00	4672.72	75	2	HOT ACCOUNT
DUMMP2 XXXXXXXXX XX	SAMPLE	AZIN	07/19/2018	8869.25		0.00	9197.02	61	3	GOOD CREDIT REPORT
DUMMP2 XXXXXXXXX XX	SAMPLE	PAULINA I	08/21/2018	3664.82		0.00	3780.02	79	3	SKIP ACCOUNT
DUMMP2 XXXXXXXXX XX	SAMPLE	OSCAR A	10/23/2018	2345.42		0.00	2403.21	1	3	SKIP ACCOUNT
DUMMP2 XXXXXXXXX XX	SAMPLE	HECTOR	01/22/2019	5515.92		0.00	5582.98	39	2	CREDIT REPORTS-RUN
DUMMP2 XXXXXXXXX XX	SAMPLE	JOSEPH C	01/22/2019	5766.88		0.00	5833.94	58	3	LOAN CON ELIGIBLE
DUMMP2 XXXXXXXXX XX	SAMPLE	REX L	01/22/2019	2007.40		0.00	2033.30	40	2	GOOD CREDIT REPORT
DUMMP2 XXXXXXXXX XX	SAMPLE	CHRISTINA N	01/22/2019	3712.32		0.00	3753.90	48	2	OPEN ACCOUNT
DUMMP2 XXXXXXXXX XX	SAMPLE	ROCHELLE M	02/18/2019	4101.20		0.00	4137.71	5	2	OPEN ACCOUNT
DUMMP2 XXXXXXXXX XX	SAMPLE	AMBER M	02/18/2019	897.03		0.00	904.33	13	1	OPEN ACCOUNT
DUMMP2 XXXXXXXXX XX	SAMPLE	JUAN C	02/18/2019	2840.82		0.00	2867.39	6	2	OPEN ACCOUNT

CLIENT	REFERENCE #		LAST NAME	FIRST NAME	DATE LISTED	INITIAL BALANCE	LAST PAYMENT	TOTAL PAID	ACCOUNT BALANCE	# CALLS	# LETTERS	ACCOUNT STATUS
DUMMP2	XXXXXXXXX	XX	SAMPLE	SHANE C	04/22/2019	959.58		0.00	1200.71	0	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	SUFI	04/22/2019	4482.14		0.00	5607.99	4	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	JESSICA	04/22/2019	619.78		0.00	775.49	0	1	PHASE TWO COLLECTION
DUMMP2	XXXXXXXXX	XX	SAMPLE	KIWON	04/22/2019	584.40		0.00	730.94	0	1	PHASE TWO COLLECTION
DUMMP2	XXXXXXXXX	XX	SAMPLE	CHIEH-YUAN	04/22/2019	4068.19		0.00	5090.74	5	1	NB FIRST 30
DUMMP2	XXXXXXXXX	XX	SAMPLE	CRISTIAN M	04/22/2019	3293.34		0.00	4120.80	3	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	DESIREE A	04/22/2019	2307.75		0.00	2885.10	3	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	DAVID A	04/22/2019	1600.78		0.00	2002.98	0	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	KARMINA	04/22/2019	1416.74		0.00	1772.01	0	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	ANDREA	04/22/2019	1904.43		0.00	2372.95	1	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	CALIX L	04/22/2019	2633.30		0.00	3295.05	3	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	KRYSTAL G	04/22/2019	2802.73		0.00	3504.78	3	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	MORGAN B	04/22/2019	1966.75		0.00	2460.91	3	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	BOGDAN	04/22/2019	1932.96		0.00	2418.00	3	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	KEN	04/22/2019	3006.38		0.00	3761.71	4	1	NB FIRST 30
DUMMP2	XXXXXXXXX	XX	SAMPLE	JASON	04/22/2019	7131.07		0.00	8914.65	0	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	JASON	04/22/2019	2057.20		0.00	2572.80	0	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	EMMA R	04/22/2019	894.71		0.00	1119.51	0	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	TRAORE	04/22/2019	4091.17		0.00	5112.95	3	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	CHRISTOPHER J	04/22/2019	7269.06		0.00	9095.79	10	1	HOT ACCOUNT
DUMMP2	XXXXXXXXX	XX	SAMPLE	LATIFA	04/22/2019	3539.62		0.00	4427.21	2	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	CARLOS I	04/22/2019	4582.63		0.00	5734.31	5	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	ADRIAN M	04/22/2019	942.70		0.00	1179.65	1	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	LINDY C	04/22/2019	864.48		0.00	1081.61	0	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	IRENE	04/22/2019	4560.54		0.00	5697.49	13	1	NB FIRST 30
DUMMP2	XXXXXXXXX	XX	SAMPLE	MOHAMMED A	04/22/2019	641.41		0.00	801.93	0	1	PHASE TWO COLLECTION
DUMMP2	XXXXXXXXX	XX	SAMPLE	EDWIN	06/19/2018	1269.45		0.00	1611.79	54	2	COHORT ACCOUNT
DUMMP2	XXXXXXXXX	XX	SAMPLE	MAYBELLINE	06/19/2018	2398.22		0.00	3045.89	67	5	COHORT ACCOUNT
DUMMP2	XXXXXXXXX	XX	SAMPLE	JEREMY I	06/19/2018	8519.53		0.00	10821.05	129	6	COHORT ACCOUNT
DUMMP2	XXXXXXXXX	XX	SAMPLE	JOSEPH R	06/19/2018	1573.49		0.00	1997.95	32	3	COHORT ACCOUNT
DUMMP2	XXXXXXXXX	XX	SAMPLE	CINDY M	09/21/2018	1548.21		0.00	1942.34	32	2	COHORT ACCOUNT
DUMMP2	XXXXXXXXX	XX	SAMPLE	RUDOLF	09/21/2018	3492.35		0.00	4381.78	2	3	MAIL RETURN
DUMMP2	XXXXXXXXX	XX	SAMPLE	XINMEI	12/21/2018	2943.37		0.00	3650.17	33	3	COHORT ACCOUNT
DUMMP2	XXXXXXXXX	XX	SAMPLE	BREANNA M	12/21/2018	2117.07		0.00	2625.50	18	2	SKIP ACCOUNT
DUMMP2	XXXXXXXXX	XX	SAMPLE	AMBER M	12/21/2018	2943.37		0.00	3650.17	24	3	COHORT ACCOUNT
DUMMP2	XXXXXXXXX	XX	SAMPLE	THIWAT N	12/21/2018	2525.00		0.00	3131.37	49	3	MAIL RETURN
DUMMP2	XXXXXXXXX	XX	SAMPLE	RICARDO J	02/18/2019	2420.38		0.00	2979.02	12	1	LOAN CON ELIGIBLE
DUMMP2	XXXXXXXXX	XX	SAMPLE	NADINE	02/18/2019	851.63		0.00	926.12	0	1	EXPERIAN TRIGGER HIT
DUMMP2	XXXXXXXXX	XX	SAMPLE	RYAN A	02/18/2019	2420.38		0.00	2979.02	13	2	COHORT ACCOUNT
DUMMP2	XXXXXXXXX	XX	SAMPLE	GEORGE	03/18/2019	1374.62		0.00	1685.73	2	1	CREDIT REPORTS-RUN
DUMMP2	XXXXXXXXX	XX	SAMPLE	WELDON R	03/18/2019	467.80		0.00	573.63	0	1	PHASE TWO COLLECTION
DUMMP2	XXXXXXXXX	XX	SAMPLE	ALBERTO	03/18/2019	2525.00		0.00	3096.50	27	2	EXPERIAN TRIGGER HIT
DUMMP2	XXXXXXXXX	XX	SAMPLE	ALEXIS C	03/18/2019	3675.38		0.00	4507.34	14	1	PENDING ONLINE APP
	ACCOUNTS TOTALED ON THIS REPORT IS: 618					2092111.78		0.00	2569603.05	5806		

YOUR ACCOUNT NUMBER AND NAME	DATE LISTED	AMOUNT LISTED	DATE LAST PAY	TOTAL PAY/ADJ	BALANCE	ACCOUNT STATUS
123456789001 AZOUDAY,PANITA	08/02/14	21792.43			21792.43	ASSET SEARCH IN PROGRESS
123456789002 BALL,LUCILLE J.	04/04/14	46474.00	01/22/13	41342.86	5131.14	ASSET SEARCH IN PROGRESS
123456789003 LOVETTE,LILLY	07/26/14	4895.79			4895.79	ASSET SEARCH IN PROGRESS
123456789004 SINGH,ROHIT	03/11/14	51307.66			51307.66	ASSET SEARCH IN PROGRESS
123456789005 TAYLOR,SWIFT C	07/06/14	23410.27	01/10/14	1586.23	21824.04	ASSET SEARCH IN PROGRESS
123456789006 WALKER,RANGER	09/11/14	22969.10	12/18/14	7952.24	15016.86	ASSET SEARCH IN PROGRESS
6 ACCOUNTS TOTALED ON THIS REPORT		170849.25		50881.33	119967.92	

ACTIVITY INVOICE

PAGE NO: 1

COAST PROFESSIONAL, INC.
214 EXPO CIRCLE STE 7
WEST MONROE, LA 71292

ACTIVITY FROM: 7/1/2019
ACTIVITY THRU: 7/31/2019

YOUR NO: SAMPLE1
INV #: 12345
CHECK NO: 54321

ATTN: CLIENT CONTACT
ABC CLIENT NAME/1ST PLACEMENT
123 MAIN STREET
ANYWHERE, NY 14454

TOTAL COLLECTIONS $15,865.00

DATE	DEBTOR'S TRANSACTION	CURRENT BALANCE	CODE N/C	AMOUNT PAID TO AGENCY	AMOUNT PAID TO YOU	TOTAL DUE AGENCY	AMOUNT DUE YOU
7/1/2019	KENT, CLARK ABCDEF12345 1	$3,840.00	31	$115.00		$23.00	$92.00
7/5/2019	LAKERS, THOMAS 000-00-0000	$1,146.00	31	$550.00		$110.00	$440.00
7/15/2019	MIDDLEBROOKS III, ROY E AAABBB111	$673.00	31	$15,000.00		$3,000.00	$12,000.00
7/24/2019	WOMAN, WONDER 123456ABCDEF 1	$286.02	31	$200.00		$40.00	$160.00

CODES

20 - Paid in Full w/Overpayment
21 - Overpayment only
27 - Final Legal Payment w/Overpayment
28 - Legal Overpayment only
30 - Paid in Full
31 - Partial Payment
32 - Forwarded Received
33 - Full Payment w/Agency Int
34 - Final Payment
35 - Settlement in Full
36 - Legal Partial Payment
37 - Fin[illegible] Payment
39 - Pa[illegible]ent Reversal
40 - Bil[illegible]es Tax
41 - OP O[illegible]ay Refund
42 - Client Refund Reversal
43 - Bill Back Non-contingent suit fees on commercial accounts
44 - Bill Back Contingent suit fees on commercial accounts
50 - Debit Adjustment
52 - Court Costs
53 - Attorney Fees
54 - Listing Fees
55 - Bad Address Fees
56 - Letter Fees
57 - Management Fees (ARC, Monitoring)
58 - Other
59 - Debtor DBJ, etc
60 - Credit Adjustment
61 - Your Check Received
62 - Client Advance Court Costs
64 - Recovered Client Collection Costs
65 - Unused Advance Costs
69 - Debtor CRJ, etc

N = NSF Check
C = Posting Error
R = Transfer Credit

OUR CHECK ENCLOSED FOR $12,692.00

SUB-TOTAL AMOUNT DUE YOU (+) → $12,692.00
SUB-TOTAL AMOUNT DUE YOU (-) → $0.00

PLEASE REMIT TO AGENCY

TOTAL PAID TO AGENCY	TOTAL PAID TO YOU	TOTAL DUE AGENCY	TOTAL DUE YOU
$15,865.00	$0.00	$3,173.00	$12,692.00

ACTIVITY INVOICE

PAGE NO: 1

COAST PROFESSIONAL, INC.
214 EXPO CIRCLE STE 7
WEST MONROE, LA 71292

ACTIVITY FROM: 7/1/2019
ACTIVITY THRU: 7/31/2019

YOUR NO: SAMPLE1
INV#
CHECK NO: 12345
54321

ATTN: CLIENT CONTACT
ABC CLIENT NAME/1ST PLACEMENT
123 MAIN STREET
ANYWHERE, NY 14454

TOTAL COLLECTIONS $745.00

DATE	DEBTOR'S TRANSACTION	CURRENT BALANCE	CODE	N/C	AMOUNT PAID TO AGENCY	AMOUNT PAID TO YOU	TOTAL DUE AGENCY	AMOUNT DUE YOU
	Direct Payment Statement							
7/1/2019	DOE, JOHN			31		$500.00	$100.00	-$135.00
	67890GHIJK 1	$1,880.00						
7/5/2019	PETWAY, KATHLEEN			31		$150.00	$30.00	-$40.50
	000-00-0000	$850.00						
7/15/2019	STEINHART, LAURA SALLY			31		$45.00	$9.00	-$9.00
	111BBBAAA	$6,617.00						
7/24/2019	SENT, SALLY			31		$50.00	$10.00	-$10.00
	GHIJK67890 1	$1,518.00						

CODES

20 - Paid in Full w/Overpayment
21 - Overpayment only
27 - Final Legal Payment w/Overpayment
28 - Legal Overpayment only
30 - Paid In Full
31 - Partial Payment
32 - Forwarded Received
33 - Full Payment w/Agency Int
34 - Final Payment
35 - Settlement In Full
36 - Legal Partial Payment
37 - Fi[illegible] Payment
38 - Pa[illegible]ent Reversal
40 - Bi[illegible]es Tax
41 - DP [illegible] Refund
42 - Client Refund Reversal
43 - Bit Back Non-contingent suit fees on commercial accounts
44 - Bit Back Contingent suit fees on commercial accounts
50 - Debit Adjustment
52 - Court Costs
53 - Attorney Fees
54 - Listing Fees
55 - Bad Address Fees
56 - Letter Fees
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59 - Debtor DBJ, etc
60 - Credit Adjustment
61 - Your Check Received
62 - Client Advance Court Costs
64 - Recovered Client Collection Costs
65 - Unused Advance Costs
69 - Debtor CRJ, etc

N = NSF Check
C = Posting Error
R = Transfer Credit

OUR CHECK ENCLOSED FOR

SUB-TOTAL AMOUNT DUE YOU (+) → $0.00
SUB-TOTAL AMOUNT DUE YOU (-) → $149.00

PLEASE REMIT TO AGENCY		TOTAL PAID TO AGENCY	TOTAL PAID TO YOU	TOTAL DUE AGENCY	TOTAL DUE YOU
	194.50	$0.00	$745.00	$149.00	$149.00

ACTIVITY INVOICE

PAGE NO: 1

ACTIVITY FROM: 7/1/2019
ACTIVITY THRU: 7/31/2019

YOUR NO: SAMPLE1

CHECK NO:

COAST PROFESSIONAL, INC.
214 EXPO CIRCLE STE 7
WEST MONROE, LA 71292

ATTN: CLIENT CONTACT
ABC CLIENT NAME/1ST PLACEMENT
123 MAIN STREET
ANYWHERE, NY 14454

TOTAL COLLECTIONS

DATE	DEBTOR'S TRANSACTION	CURRENT BALANCE	CODE	N/C	AMOUNT PAID TO AGENCY	AMOUNT PAID TO YOU	TOTAL DUE AGENCY	AMOUNT DUE YOU
	Summary Statement							
	SAMPLE1 ABC CLIENT/1ST PLACEMENT							
	SAMPLE1 REGULAR STATEMENT				$15,865.00		$3,173.00	$12,692.00
	SAMPLE1 ABC CLIENT/1ST PLACEMENT							
	SAMPLE1 SEPARATE DIRECT PAYMENT					$745.00	$149.00	
	SUMMARY TOTALS CURRENT PERIOD				$15,865.00	$745.00	3,322.00	$ 12,692.00

CODES

20 - Paid In Full w/Overpayment
21 - Overpayment only
27 - Final Legal Payment w/Overpayment
28 - Legal Overpayment only
30 - Paid In Full
31 - Partial Payment
32 - Forwarded Received
33 - Full Payment w/Agency Int
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59 - Debtor DBJ, etc
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61 - Your Check Received
62 - Client Advance Court Costs
64 - Recovered Client Collection Costs
65 - Unused Advance Costs
69 - Debtor CRJ, etc

N = NSF Check
C = Posting Error
R = Transfer Credit

OUR CHECK ENCLOSED FOR

SUB-TOTAL AMOUNT DUE YOU (+) → $0.00
SUB-TOTAL AMOUNT DUE YOU (-) → $194.50

PLEASE REMIT TO AGENCY		TOTAL PAID TO AGENCY	TOTAL PAID TO YOU	TOTAL DUE AGENCY	TOTAL DUE YOU
	194.50	$31,730.00	$1,490.00	$6,644.00	$25.384.00

COAST PROFESSIONAL, INC.®

PLACEMENT ANALYSIS REPORT - 5/1/2019
SAMPLE CLIENT - DUMMP2

	GROSS PLACEMENT		INVALID PLACEMENT		NET PLACEMENT		COLLECTIONS		ACCOUNT ACTIVATIONS		PIF/SIF	CLOSE & RETURN		OPEN ACCOUNTS	
AGING PERIOD	NO.	AMOUNT	NO.	AMOUNT	NO.	AMOUNT	AMOUNT	PERCENT	NO.	PERCENT	NO.	NO.	AMOUNT	NO.	AMOUNT
49-60 MONTHS	4	$5,623.55	0	$0.00	4	$5,623.55	$1,052.60	18.72%	1	25.00%	0	3	$4,591.36	0	$0.00
37-48 MONTHS	4	$11,919.78	0	$0.00	4	$11,919.78	$0.00	0.00%	0	0.00%	0	4	$11,776.78	0	$0.00
25-36 MONTHS	4	$14,091.14	0	$0.00	4	$14,091.14	$12,157.99	86.28%	3	75.00%	2	2	$2,045.94	0	$0.00
13-24 MONTHS	8	$30,788.54	0	$0.00	8	$30,788.54	$9,090.26	29.52%	3	37.50%	3	5	$21,257.34	0	$0.00
May 2017															
June 2017															
July 2017															
August 2017															
September 2017															
October 2017															
November 2017															
December 2017															
January 2018															
February 2018															
March 2018	4	$17,913.92	0	$0.00	4	$17,913.92	$2,674.30	14.93%	1	25.00%	1	3	$14,754.90	0	$0.00
April 2018	4	$12,874.62	0	$0.00	4	$12,874.62	$6,415.96	49.83%	2	50.00%	2	2	$6,502.44	0	$0.00
1-12 MONTHS	20	$46,359.27	1	$1,583.75	19	$44,775.52	$1,725.00	3.85%	2	10.53%	2	0	$0.00	17	$43,956.42
May 2018	1	$858.64	0	$0.00	1	$858.64	$867.28	101.01%	1	100.00%	1	0	$0.00	0	$0.00
June 2018	4	$13,760.69	0	$0.00	4	$13,760.69	$0.00	0.00%	0	0.00%	0	0	$0.00	4	$14,330.88
July 2018															
August 2018															
September 2018	3	$6,624.31	1	$1,583.75	2	$5,040.56	$0.00	0.00%	0	0.00%	0	0	$0.00	2	$5,185.78
October 2018															
November 2018															
December 2018	4	$10,528.81	0	$0.00	4	$10,528.81	$0.00	0.00%	0	0.00%	0	0	$0.00	4	$10,706.91
January 2019															
February 2019	4	$6,544.02	0	$0.00	4	$6,544.02	$857.72	13.11%	1	25.00%	1	0	$0.00	3	$5,645.02
March 2019	4	$8,042.80	0	$0.00	4	$8,042.80	$0.00	0.00%	0	0.00%	0	0	$0.00	4	$8,087.83
April 2019															
TOTALS	40	$108,782.28	1	$1,583.75	39	$107,198.53	$24,025.85	22.41%	9	23.08%	7	14	$39,671.42	17	$43,956.42

COLLECTION COSTS ARE NOT INCLUDED IN ANY DOLLAR AMOUNT

COAST PROFESSIONAL, INC.®

PLACEMENT ANALYSIS REPORT - 5/1/2019
SAMPLE CLIENT - DUMMI1

	GROSS PLACEMENT		INVALID PLACEMENT		NET PLACEMENT		COLLECTIONS		ACCOUNT ACTIVATIONS		PIF/SIF	CLOSE & RETURN		OPEN ACCOUNTS	
AGING PERIOD	NO.	AMOUNT	NO.	AMOUNT	NO.	AMOUNT	AMOUNT	PERCENT	NO.	PERCENT	NO.	NO.	AMOUNT	NO.	AMOUNT
49-60 MONTHS	6	$12,380.67	2	$5,304.31	4	$7,076.36	$4,628.34	65.41%	2	50.00%	1	2	$2,569.72	0	$0.00
37-48 MONTHS	45	$113,109.41	5	$15,665.47	40	$97,443.94	$58,085.17	59.61%	18	45.00%	14	23	$38,763.83	0	$0.00
25-36 MONTHS	33	$81,567.59	13	$28,480.41	20	$53,087.18	$30,629.92	57.70%	12	60.00%	11	9	$22,109.98	0	$0.00
13-24 MONTHS	50	$130,711.01	3	$19,199.09	47	$111,511.92	$35,300.75	31.66%	13	27.66%	11	35	$78,260.38	1	$455.68
May 2017	1	$3,050.37	0	$0.00	1	$3,050.37	$0.00	0.00%	0	0.00%	0	1	$3,050.37	0	$0.00
June 2017	1	$2,412.59	0	$0.00	1	$2,412.59	$2,451.38	101.61%	1	100.00%	1	0	$0.00	0	$0.00
July 2017	12	$43,759.73	0	$0.00	12	$43,759.73	$24,068.68	55.00%	5	41.67%	5	7	$23,890.61	0	$0.00
August 2017															
September 2017															
October 2017															
November 2017															
December 2017	24	$52,292.86	3	$19,199.09	21	$33,093.77	$3,936.47	11.89%	3	14.29%	1	19	$27,563.26	1	$455.68
January 2018	8	$19,732.34	0	$0.00	8	$19,732.34	$4,210.77	21.34%	3	37.50%	3	5	$15,278.47	0	$0.00
February 2018															
March 2018	1	$2,131.24	0	$0.00	1	$2,131.24	$0.00	0.00%	0	0.00%	0	1	$1,771.98	0	$0.00
April 2018	3	$7,331.88	0	$0.00	3	$7,331.88	$633.45	8.64%	1	33.33%	1	2	$6,705.69	0	$0.00
1-12 MONTHS	30	$80,309.21	2	$6,840.48	28	$73,468.73	$18,667.47	25.41%	8	28.57%	6	0	$0.00	22	$55,774.66
May 2018	3	$8,935.78	0	$0.00	3	$8,935.78	$971.49	10.87%	1	33.33%	1	0	$0.00	2	$8,335.10
June 2018	5	$8,423.06	1	$1,888.67	4	$6,534.39	$1,268.84	19.42%	1	25.00%	1	0	$0.00	3	$5,493.39
July 2018	1	$4,259.44	0	$0.00	1	$4,259.44	$1,148.42	26.96%	1	100.00%	0	0	$0.00	1	$3,258.51
August 2018	2	$5,838.80	0	$0.00	2	$5,838.80	$3,726.55	63.82%	1	50.00%	1	0	$0.00	1	$2,225.46
September 2018	4	$8,959.20	0	$0.00	4	$8,959.20	$2,416.06	26.97%	2	50.00%	1	0	$0.00	3	$6,769.92
October 2018	2	$6,424.53	0	$0.00	2	$6,424.53	$0.00	0.00%	0	0.00%	0	0	$0.00	2	$6,583.02
November 2018	3	$9,319.75	0	$0.00	3	$9,319.75	$2,433.71	26.11%	1	33.33%	1	0	$0.00	2	$7,056.37
December 2018	4	$7,930.53	1	$4,951.81	3	$2,978.72	$0.00	0.00%	0	0.00%	0	0	$0.00	3	$2,750.06
January 2019	1	$3,718.00	0	$0.00	1	$3,718.00	$0.00	0.00%	0	0.00%	0	0	$0.00	1	$3,410.06
February 2019	1	$6,650.82	0	$0.00	1	$6,650.82	$6,702.40	100.78%	1	100.00%	1	0	$0.00	0	$0.00
March 2019	3	$7,340.30	0	$0.00	3	$7,340.30	$0.00	0.00%	0	0.00%	0	0	$0.00	3	$7,381.14
April 2019	1	$2,509.00	0	$0.00	1	$2,509.00	$0.00	0.00%	0	0.00%	0	0	$0.00	1	$2,511.63
TOTALS	164	$418,077.89	25	$75,489.76	139	$342,588.13	$147,311.65	43.00%	53	38.13%	43	69	$141,703.91	23	$56,230.34

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