

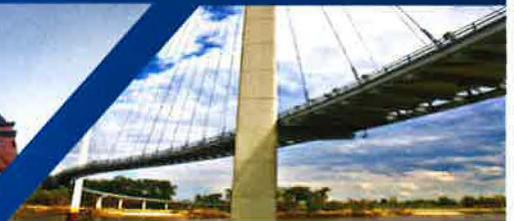


Nebraska Department of Revenue

CBE Response to RFI DOR-01282020



NEBRASKA
DEPARTMENT OF REVENUE



Sales Contact:

Mike Ruiz

Vice President of Business Development

Tel: 319-883-6611

Mike.Ruiz@cbecompanies.com



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**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.

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.

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: The CBE Group Inc.

COMPLETE ADDRESS: 1309 Technology Parkway

TELEPHONE NUMBER: 319-883-6611 FAX NUMBER: 319-235-1996

SIGNATURE:  DATE: March 11, 2020

TYPED NAME & TITLE OF SIGNER: Mike Ruiz, Vice President, Business Development

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:	The CBE Group Inc.
Vendor Address:	1309 Technology Parkway Cedar Falls, IA 50613
Contact Person & Title:	Mike Ruiz, Vice President, Business Development
E-mail Address:	Mike.Ruiz@cbecompanies.com
Telephone Number (Office):	319-883-6611
Telephone Number (Cellular):	319-883-6611
Fax Number:	319-235-1996

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:	The CBE Group Inc.
Vendor Address:	1309 Technology Parkway Cedar Falls, IA 50613
Contact Person & Title:	Mike Ruiz, Vice President, Business Development
E-mail Address:	Mike.Ruiz@cbecompanies.com
Telephone Number (Office):	319-883-6611
Telephone Number (Cellular):	319-883-6611
Fax Number:	319-235-1996



March 13, 2020

Ms. Julie Schiltz
State Purchasing Bureau
1526 K Street Ste. 130
Lincoln, NE 68509-4818

Dear Ms. Schiltz,

Thank you for the opportunity to present the requested information to the Nebraska Department of Revenue (DOR) for the collection of delinquent tax accounts. The CBE Group Inc. (CBE) is a trusted partner to federal and state government entities, and we look forward to beginning a rewarding relationship with the DOR. Establishing a partnership with CBE will help the DOR meet the needs of taxpayers while serving the constituents of Nebraska with quality service.

The DOR will benefit from the best practices and resources of a national collections firm, combined with the hands-on approach of a local agency. Nebraska strives to create opportunity through more effective, more efficient, and customer-focused state government. A relationship with CBE will complement and enhance this mission, based on the following:

- ✓ **Demonstrated expertise** - CBE is a veteran of the government collection industry. Our top-quality work with the three largest federal collections contracts, **The Internal Revenue Service, the U.S. Department of the Treasury Bureau of the Fiscal Service** and **the U.S. Department of Education**, demonstrate our ability to achieve top rates on complex contracts.
- ✓ **Economic benefit to Nebraska** - CBE has been implementing successful collection strategies for 87 years, and our tried and true methods will enhance revenue generation for the DOR, allowing you to focus on serving your constituents and enabling them to succeed. CBE's headquarters are located in Cedar Falls, Iowa, which is only a few hours away from the DOR's offices. This close proximity means **we understand and share Nebraska's economy and demographics**, and we will apply this knowledge to apply best practices and generate maximum recoveries for the DOR.
- ✓ **A better customer experience** - As a partner who will be an extension of the DOR's constituent experience, we know government collections is fundamentally about balancing performance with the customer experience and a low complaint rate. We treat customers with the upmost respect, and our high satisfaction rate and A+ rating with the Better Business Bureau is proof of our professionalism. Customer surveys with our IRS contract show a **99 percent taxpayer satisfaction rate**.
- ✓ **Robust Information Security** - All data in CBE's system is protected through numerous security measures, and based on standards including the IRS Publication 1075, PCI-DSS, ISO 27002, NIST 800.53, HIPAA/HITECH Act, and GLBA.



CBE is in receipt of Addendum 1 dated February 28, 2020.

CBE's consistent performance with tax collection contracts, along with our dedication and solid financial stability means our suggestions will help achieve the lowest-risk and highest-reward for the DOR.

We appreciate the opportunity to present the requested information to the Nebraska Department of Revenue, and we look forward to participating in the next step in your procurement process.

Regards,

A handwritten signature in blue ink that reads 'Mike Ruiz'. The signature is written in a cursive, flowing style.

Vice President, Business Development
319-833-6611 | Mike.Ruiz@cbecompanies.com

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CAPABILITIES

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

CBE is a leading provider of collection recovery and outsourced contact center solutions for more than eight decades. Our ability to constantly adapt, evolve, and stay ahead of the regulatory environment sets us apart from other vendors. We've implemented the controls necessary to meet the most stringent requirements of federal contracts, as well as complex companies nationwide. With more than 1,300 employees company-wide and three locations, CBE delivers the right solution for our clients' ever-changing business needs.

COLLECTION SERVICES

CBE's proven experience and past performance is sustained over many years working within a diverse range of partnerships. Our corporate culture emphasizes treating consumers with the utmost respect while reaching the optimal client solution. With over 30 years of government account expertise, CBE is proud to deliver top performance with a very low complaint rate to our clients like the DOR.

OUR COMMITMENT TO THE NEBRASKA DEPARTMENT OF REVENUE

CBE is committed to applying our best practices and customer-centric model to the DOR's program. Our corporate values ensure that we will treat your constituents with the upmost respect while reaching the optimal client solution.

These qualities, demonstrated by CBE, should be demanded of an accounts receivable management partner:

- ✓ **Advanced customer-centric communication methods:** To reach taxpayers on their terms
- ✓ **NextGen Data Analytics:** Focuses work efforts for more efficient contact
- ✓ **TCPA Compliant Technology:** Mitigates TCPA risk using the LiveVox Human Contact Initiator (HCI) platform
- ✓ **Extensive Skip Tracing Waterfall Process:** Ensures we are locating constituents efficiently
- ✓ **Secure Client Portal:** Allows the DOR to view the status of your placements in real-time, place accounts, and review reports
- ✓ **Robust Compliance Protocols:** Ensures brand protection for the DOR by eliminating regulatory complaints
- ✓ **EFT Agree:** CBE utilizes EFT Agree to comply with EFT/ACH requirements; EFT Agree captures the constituent's authorization and signature and provides required disclosures to them.

CBE CORE VALUES

Leadership
Integrity
Respect
Innovation
Continuous Improvement

Secure Account Placement

CBE electronically exchanges encrypted client data, including account and payment files. Files are exchanged on a daily, weekly, or monthly basis via the most up-to-date and secure method, SSH File Transfer Protocol (SFTP). Using SFTP transfer provides both entities with the best form of security and reliability; through an

SFTP server administered by CBE, we can log in online and transmit files directly. This is an essential capability to request from any collections partner.

Account Assignment

We do not take a one size fits all approach like most third-party collection agencies. The fact that we are a smaller, quality-focused agency allows us the flexibility, agility and nimbleness to customize our collection approach to fit the profile of our client and their constituents. In doing so, we align our associates with the different treatment strategies necessary to deliver on your expectations from both a recovery and quality perspective.

Account Scrubbing

Within the first 24 hours of placement, CBE performs an initial scrub to verify accounts for bankruptcy, deceased, Service Members Civil Relief Act, correct address, and telephone number to increase contact rates before we send the first debt collection notice. After the initial notice is sent, accounts automatically enter our system for immediate telephone contact. Entry into the dialing system also ensures incorrect telephone numbers are quickly identified for skip tracing.

Effective Skip Tracing Technologies

Skip tracing is primarily performed through our patented, highly sophisticated and refined LocateSmarter automatic skip trace waterfall process designed to identify and locate even the hardest to find constituents. The process is an important component in the success of our collection process, and our unique approach gives us a competitive advantage over other collection agencies. Associates also access other premium online search tools to locate constituents including Accurant, LexisNexis, and Innovis.



NextGen Data Analytics – Delivering Results Through Smarter Strategies

Proprietary scoring and segmentation strategies can be tailored to the DOR's portfolio. CBE's analytics team leverages the functionality of our system to queue accounts for collection. Account segmentation defines queues and treatment. CBE's investment in leading-edge software assists in creating sophisticated models that allow us to predict a variety of future consumer behaviors using multiple consumer characteristics.



CBE is in the process of adding Attunely as an additional account scoring vendor. Attunely accurately finds the optimal time to contact each constituent. This technology provides a call file that matches the highest-yielding accounts with an optimal contact time slot. This allows CBE to make more right party contacts using fewer call attempts.

Scoring and segmentation strategies will benefit the DOR in the following ways:

- ✓ **Increased Right Party Contacts** - Maximizing the number of right party contacts while avoiding overcalling.
- ✓ **Maximized Work Efforts** - These tools pave the way for strategic plans designed to maximize work efforts and deliver optimal performance for our clients.
- ✓ **Enhanced Consumer Experience** - Using the appropriate treatment strategies not only maximizes recoveries, but also leads to an enhanced constituent experience.

- ✓ **Effective Segmentation** - CBE strategies segment business more effectively and efficiently, leading to top results earlier in the placement.
- ✓ **Efficient Resolution** - Accounts are segmented, and the manual calling campaigns are programmed to allow us to communicate most effectively with each constituent, making account resolution extremely efficient for CBE and the DOR.

Proprietary Collection System

CBE developed cat.i (custom account tracking intelligence), a proprietary collection software tailored to the exacting requirements of our clients. cat.i is a powerful, flexible, and highly scalable system that uses intelligent decision-making to support effective operational strategies.

cat.i facilitates organization of accounts based upon information received from the original placement file, skip tracing results, and/or collection efforts. It also allows CBE to manage account inventory in real-time. Accounts move through established workflows, which change when new information becomes available. The system stamps each account with the user's identification code every time the account is worked or viewed.



Because the system is easy for our collection representatives to use, it enables efficient work efforts and maximum productivity. CBE's in-house IT Department continually modifies and enhances the software, making cat.i one of the most powerful systems in the collection industry today. Using a partner that controls their own collection system reduces risk for the DOR.

Collection Letter Strategies

CBE's collection system supports extensive correspondence efforts. CBE uses a variety of letters to inform, educate and obtain prompt payment from constituents. In addition, all CBE collection letters are reviewed and approved by our General Counsel and ACA International. This extensive review further ensures compliance with federal, state, and local laws and regulations. This is important to our clients because certain states require specific language or terms to be included in validation notices. CBE's collection letters are generated automatically based on predetermined parameters.

Call Strategies

Phone activity and call frequency are managed by tailored workflow strategies within CBE's collection system. Our collection efforts continue until contact is established; at which time the consumer is asked to remit payment in full. CBE uses work sloping to generate the highest liquidation for each of our clients. Future calls are made as dictated by collection follow-up strategies. We place calls at varying times of the day for optimum contact opportunities. However, we ensure compliance and respect constituent expectations.

Focus on Sustainable and Affordable Payment Arrangements

A central reason for CBE's demonstrated success is our focus on establishing payment arrangements that lead to the best possible solution to a taxpayer's debt. Prior to establishing a payment arrangement, CBE profiles the consumer to identify their ability to pay. In doing so, we offer payment arrangements that are fair to constituents and maximize the return for our clients. CBE's strategy results in a strong, month-over-month payment stream.

Bilingual Capabilities

CBE can communicate with any constituent encountered during the collections process. We provide foreign language support for non-English speaking constituents through CBE's bilingual collection associates, or by using language line resources. Letters can be sent in other languages as well, if desired.

IVR Messaging Capabilities

CBE can deliver custom virtual messages for landline phones that reflect progressing levels of urgency based on the DOR's guidelines and requirements. Taxpayers can choose from several convenient payment options when returning a call to the dedicated toll-free number. The constituents can then enter key account information, hear summarized account balance and information, and choose the payment option that is best for them. This payment is directly integrated with CBE's collection system, so account details are automatically updated.

Settlement Authority

CBE's philosophy is to use settlements as a negotiation tool. Settlements will only be offered only with the DOR's permission. However, this is an opportunity for an experienced partner to share collection strategies that have worked for other government agencies.

Close and Return Procedures

CBE recognizes that the DOR may recall accounts at any time. CBE closes and returns accounts at your request, or when the account is determined to be uncollectible for reasons that include:

- Skip traced and unable to locate constituents
- No collectible assets
- Filed for bankruptcy
- Disabled or deceased

All accounts that are closed and returned are removed from the consumer's credit file. CBE will continue to work the accounts until recalled by the DOR.

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.

Members of Operations Management, Organizational Development, Quality Assurance and Compliance monitor collection associate's phone calls with customers. A minimum of five calls per collection associate of varying call durations are selected for monitoring. We analyze each call for quality assurance and compliance with documented standards. CBE utilizes speech technology to extract meaningful business intelligence from recorded calls by utilizing indicators of stress, excess silence, or other signs. This assists CBE in promoting an optimal outcome for the collection associate, the taxpayer, and the DOR.

CBE's use of speech analytics allows us to improve performance and compliance for the DOR by:

- Monitoring spoken words, omissions, and tone
- Identifying patterns and characteristics that result in successful calls

- Facilitating targeted training to incorporate best practices and/or when a weakness or deficiency is identified
- Allowing us to document all regulatory disclosures or client-based requirements
- “Inspecting what we expect” from every associate
- Lowering risk of non-compliance and costly litigation risk factors

CBE records 100 percent of our calls; those calls are archived for up to seven years, including manually dialed accounts.

ROBUST INFORMATION SECURITY PROTOCOLS

CBE’s information security posture is based on the fundamentals outlined in major national and international security standards. This includes well-known standards such as **IRS Publication 1075 Certification, PCI-DSS, ISO 27002, NIST 800.53, HIPAA/HITECH Act, and GLBA**. The wide-ranging group of standards ensures that the CBE framework is based on security best practices.

CBE’s approach to ensure data security includes detailed policies and procedures in each of the following areas:

- Continuous Monitoring and Incident Response
- Governance Oversight and Risk Management
- Security Awareness
- Physical and Environmental Security
- Business Continuity and Disaster Recovery



Audits conducted by independent organizations, including RSM, Crimson Security, and Treasury Inspector General for Tax Administration (TIGTA), confirm CBE's security standards and find them to be in full compliance.

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

CBE handles accounts on which we are notified that the consumer has filed for bankruptcy protection promptly and in compliance with FDCPA, FCRA, and bankruptcy laws. When CBE is made aware that a bankruptcy has been filed, we will not contact the taxpayer again, in accordance with FDCPA regulations. From the point of filing through the disposition of the bankruptcy, CBE will only communicate with the attorney. We will wait for the bankruptcy to be dismissed (not approved), discharged (approved) or we receive a relief for stay before communication with the taxpayer resumes. This applies when a debt is not part of the bankruptcy estate.

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

As a federal contractor ourselves, CBE takes the following steps to protect consumer’s personal information used in the pursuit of collections, including Social Security Number, account numbers, loan numbers, banking information, references, credit card numbers and phone numbers:

1. All employees must attend Privacy and Security training as a new employee and thereafter twice per year. Employees also sign Privacy and Security Standard Operating Procedure document agreeing to protect the consumer's personal information from inappropriate use and only use it for the purpose of collecting the debt on behalf of our client. Violation of this may result in disciplinary action up to and including termination.
2. Employee computer displays are set to go to screensaver and password protection after 10 minutes. Passwords must be changed every 60 days.
3. CBE uses proven encryption technologies to protect data during electronic transmission.
4. CBE uses Secure Sockets Layer (SSL) protocol using at least 128-bit key lengths to encrypt traffic on our corporate websites.
5. CBE's preferred method of transmitting data securely to and from our clients is SSH File Transfer Protocol (SFTP). Each client is set up with a unique username and password to securely log into CBE's secure SFTP server over the Internet.
6. CBE's approved method for remote access is based on VPN technology, which forces traffic through an encrypted tunnel. This ensures that all remote access traffic passed between CBE's network and end users is fully encrypted.
7. CBE's policies do not allow passwords to be sent across the network in "clear text" format. In addition, we do not allow passwords to be listed in clear text for the purpose of automating a login sequence. All passwords must be stored and transmitted in an encrypted format.
8. To further protect sensitive data, CBE operates in secure facilities. All employees wear access control identification badges that limit access to the office buildings and other areas as designated. CBE's Information Technology, Quality Assurance, Finance Departments, and certain Operations Departments are secured separately by proximity readers and can be accessed by authorized personnel only. Visitors are required to sign in at the reception desk, wear a visitor identification badge, and be escorted by a CBE employee at all times.

If a taxpayer claims fraud or identity theft on an account, CBE follows these steps:

1. Contact law enforcement if the compromise could result in harm to a person or business.
2. Notify affected businesses and clients.
3. Contact the major credit bureaus if names and Social Security numbers have been stolen. If the compromise involves a large group of people, we will advise the credit bureaus if we are recommending that people request fraud alerts for their files to facilitate customer assistance.

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

CBE carries all appropriate insurance and bonds. We coordinate with our insurance broker to continually evaluate our insurance needs.

Describe additional measures used to ensure the following:

2.1 Confidentiality and security of Protected Information.

CBE takes great care in how we handle Protected Information. We protect against any violations that would put them or us at risk for non-compliance.

CBE is audited annually for adherence to security standards by a qualified third-party security company. CBE undergoes annual audits for compliance with PCI-DSS and ISO 27002 including GLBA, HIPAA and HITECH. In addition, regularly scheduled tasks ensure that patches are applied, vulnerabilities are rectified, and antivirus and malware software is up-to-date and running on all systems. File integrity monitoring tools run 24x7 and alert any issues on the network.

CBE provides privacy training to all employees, who are then required to sign an agreement, signifying that they understand privacy requirements and agree to comply.

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

CBE maintains reasonable and appropriate administrative, technical, and physical safeguards to ensure the integrity and confidentiality of Private Information, which includes but is not limited to: Personal Health Information (PHI), National Provider Information (NPI) and Federal Records. CBE security protocols also protect against any reasonably anticipated threats or hazards to the security and integrity of Private Information, including unauthorized use or disclosures and otherwise ensures compliance with applicable privacy laws.

2.3 Protect against unauthorized access or disclosure of information.

Access levels are role based and are provisioned based on a user template for the specific job title of the new employee. All access provisions are assigned based on the principle of least privilege.

CBE controls physical access through card badge access. Two-factor badge-and-pin access is required to enter payment processing areas and the data center. In addition, 24x7 alarm systems and CCTV are in place to ensure any attempt to access the building without authorization will immediately alert CBE.

Reviews of badge access logs are performed monthly by the facilities team. Additionally, CCTV feeds are live monitored and reviews of the recordings are performed quarterly by the facilities team.

Unique user logins and passwords along with role-based security limit access to system applications. Data is secured in transmission on CBE's fully encrypted wide area network (WAN). CBE requires all data file transfers are encrypted. 256-bit AES encryption is utilized for transmission of files, and HTTPS and certificates are used for all public-facing websites.

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.

CBE maintains robust and appropriate administrative, technical, and physical safeguards to ensure the integrity and confidentiality of private information. CBE also protects against any reasonably anticipated threats or hazards to the security and integrity of private information, including unauthorized use or disclosures. All data in CBE's system is protected through numerous security measures that are evaluated favorably against requirements derived from the ISO 27002 security standard.

CBE undergoes annual audits for data security, including the following. The audits are conducted independently by Crimson Security and confirm CBE's security standards to be in full compliance.

Audit Type	Purpose	Results
Information Security Assessment based on IRS Publication 1075 conducted on August 22, 2019	This audit determines CBE's state of security for sound practices, as defined in IRS Publication 1075 Section 9, which consists of several security areas or domains based on NIST 800-53.	Data protection is strong regarding all sensitive data. Encryption methods are used in all possible places during storage and transmission. Overall information security is strong at CBE Companies.
Information Security Assessment Report for ISO 27002 Compliance conducted on September 30, 2019	The audit determines CBE's state of security for sound practices as defined in ISO 27002, which consists of eleven security areas: <ol style="list-style-type: none"> 1. Security Policy 2. Organizing Information Security 3. Asset Management 4. Human Resources Security 5. Physical and Environmental Security 6. Communications and Operations Management 7. Access Control 8. Information Systems Acquisition, Development and Maintenance 9. Information Security Incident Management 10. Business Continuity Management 11. Compliance 	Data protection is strong regarding all card sensitive data. Encryption methods are used in all possible places during storage and transmission. Overall information security is satisfactory at CBE.

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.

Building and sustaining effective, positive vendor relationships directly correlates with how CBE is able to serve our clients, minimize risk, and protect the information and assets in our care.

CBE's vendor management is built on the following processes:

- ✓ **Supplier risk assessment** - Identifies each vendor as low, medium or high risk
- ✓ **Supplier due diligence review** - A review of documents and records regarding business policies and practices according to the risk level
- ✓ **Contract management** - Dependent on risk assessment and due diligence, retained and audited according to policy
- ✓ **Supplier supervision** - Regular and ongoing supervision of each vendor, with annual status reports to CBE's Executive Management Team on medium and high-risk suppliers

CBE's Chief Information and Administrative Officer oversees the vendor management process.

Describe the following processes:

4.1 Debtor complaint management and reporting of complaints to client.

Our organization, staffing, and management approach respectfully and professionally helps constituents understand and meet their tax responsibilities with integrity and fairness in a secure, confidential environment. Annually assisting over 2 million taxpayers with obligations totaling \$5 billion, CBE knows how to support federal, state, and local government collection programs. CBE has worked with federal and state agencies and organizations for more than three decades, and our goal has always been zero complaints and high satisfaction rates for our government partners.

All managers and supervisors maintain a documented log of every complaint they receive, and a Compliance Administrator consolidates them into a master Complaint Log each month. To support our belief in ethical collection practices, CBE has zero tolerance for justifiable complaints and thus abides by a formal complaint handling process with successive levels of management to process the receipt, analysis, resolution, and documentation of all complaints, regardless of whether they are ultimately deemed unsubstantiated.

Upon receipt of a customer complaint, either directly from the customer or from the DOR, we immediately:

- ✓ Suspend collection activity pending resolution
- ✓ Log the complaint
- ✓ Forward it to a Compliance Administrator who records and gathers the appropriate documentation

Any communication, written or verbal, received from any attorney, regulatory agency, government official, or Better Business Bureau is date stamped upon receipt and immediately forwarded to CBE's Quality Assurance Supervisor and will respond, under normal circumstances, within 48 hours of receipt.

CBE documents all complaints with or without merit in our master complaint log. A Compliance Administrator then reviews the complaint log and determines the severity and whether it requires further review via call recording as well as the appropriate action needed.

Resolving Disputes

CBE will immediately notify the DOR of a disputed account. If a consumer is contacted by one of our associates regarding a dispute on the account balance, CBE follows a formal dispute resolution process:

1. The associate attempts to gather as much information as possible to establish the grounds for the dispute:
 - a. Is the taxpayer disputing and/or refusing to pay the entire debt and why?
 - b. Is the taxpayer disputing a portion of the debt included in a list of debts and why?
 - c. If the taxpayer refuses to disclose any information for dispute and/or refusal to pay, the associate documents the dispute/refusal in detail.
2. Account status is changed to DPT (Disputed-Getting Information) in our collection system. All efforts to encourage payment on the disputed debt or portion are suspended.

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

ROBUST TRAINING REGIMEN

CBE's intensive commitment to training gives all associates a fundamental knowledgebase beginning on their first day at CBE. Our expert trainers are supported by a full-time Learning Management System to ensure all CBE employees receive the most comprehensive training possible from Day One and throughout their career. New employees begin with a two-week classroom training followed by one week of live on-the-job training that takes place both in the classroom and on the collection floor, with their first phone calls taken in the classroom.

Compliance training starts on Day One during orientation with Human Resources where all employees go through Privacy and Security Training. The training includes FCRA, HIPAA "The Privacy Rule", Gramm-Leach Bliley Act, Privacy Act of 1974, REG. Z, REG. B, REG. AA, Bank Secrecy Act of 1970, and The FACT Act.

On Day Two, all new hires who have access to our collection system must complete eight hours of collection laws and procedure training, which includes FDCPA & TCPA; the test is administered immediately following. The test is 40 questions and requires a passing score of 34 in order to maintain employment. Collection laws and procedures are revisited throughout training and annually for the remainder of their career.

Collection associates gain a thorough understanding of all specifics related to government receivables, insurance terminology, and compliance regulations.

CBE's training program includes:

- ✓ **Computer-based training**
- ✓ **Hands-on activities**
- ✓ **Collection simulations**
- ✓ **Instructor-led learning**

New Hire Training educates and tests associates on the applicable laws and regulations, both federal and state, as well instruction on all collection software. New Hire associates receive both training and hands-on practice in ethical collection techniques and successful negotiation skills. These skills are reinforced by working closely with proven associates throughout training. All tests require an 85 percent passing grade, with additional training and one retake available.

CBE provides numerous skill enhancement opportunities while in the New Hire Training program, as well as the continuous training we provide after completion of New Hire Training. CBE employees learn to manage their thinking, conflicts and experiences, resulting in the development of enterprise-focused individuals who can help lead CBE into the future.



A summary outline of our intensive New Hire Training program is shown as follows:

Module	Description
Orientation	<ul style="list-style-type: none"> • Associate roles • Associate responsibilities • Core Values • Ethical pledge • Expectations • Corporate culture • Professionalism
Quality	<ul style="list-style-type: none"> • Expectations of call monitoring and quality assurance
Systems	<ul style="list-style-type: none"> • cat.i collection system • LiveVox platform • LocateSmarter skip tracing tools • SharePoint

<p>Collection Skills</p>	<ul style="list-style-type: none"> • Laws & regulations • Privacy Act of 1974 • Skip tracing • Communication • Compassion and diplomacy skills • CBE processes • Confidence • The right questions • 5 negotiation steps • Mock calls • Call calibrations • Daily reports & payment tracking
<p>Client-Specific Training</p>	<ul style="list-style-type: none"> • Payment options, process, & requirements • Call flow & checklist
<p>Continuing Education</p>	<ul style="list-style-type: none"> • Skip tracing • Communication • Better U (based on Stephen Covey's The 7 Habits of Highly Effective People) • CBEU (soft skills, leadership, technical skills) • Call calibrations • Annual training • Customer talk-off review • Changes in operational procedures & regulation

Once New Hire associates successfully complete training, their trainer teams with Operations management to constantly monitor calls, coach, and continue development through various mediums (i.e. face-to-face, email, handouts, and video). Employees also have access to our Training Site which provides ongoing training material and tips on how to be a better associate and a better person. Each new associate is encouraged to complete a “player profile” which indicates how they prefer to receive feedback, what motivates them, and their personality type. This information is critical for both the trainer and Operations to meet the needs of each individual employee.

CBE successfully uses a Training Bay program where we transition new hires onto the floor for a month. In this setting, skills are reinforced by working closely with a proven and experienced collection associate, which leads to more efficient and effective staff for our government clients.

QUALITY ASSURANCE

To ensure strong performance, CBE’s quality assurance initiatives are executed and monitored by our Quality Assurance Department. We not only record all calls, but also systematically analyze each call for quality assurance and compliance with documented standards. This systematic analysis is done through speech analytic technology which allows for a level of call analysis not otherwise available. Quality Assurance provides feedback to the appropriate supervisors and managers. The supervisor and/or manager discuss these observations with the associate, provide a response to confirm the issues have been addressed and identify any corrective action taken.

Our Quality Management Plan consists of four core components with policies and processes supporting each component:

- ✓ **Planning** - Forecasting, competitive performance, goal setting, and strategy implementation
- ✓ **Monitoring** - Productivity dashboards, incentive tracking, and pipeline reporting
- ✓ **Assessing** - Staffing re-allocation, strategy adjustments, and process improvement
- ✓ **Corrective Action** - Training, Collector Development Plans (CDP), and management adjustments

OPERATIONAL PROCESS IMPROVEMENT

CBE believes in constant improvement. The integration of continuous improvement into our every-day business practices and associate development allows us to offer innovative solutions and strategies that increase performance levels. To ensure CBE delivers strong performance, we focus on comprehensive training, advanced analytical resources, quality assurance, and compliance monitoring.

We endeavor to be proactive with necessary improvements and operational standards. Our management staff has the foresight to implement program enhancements so that our recoveries remain consistent. We work with clients in several high-compliance markets, allowing us to see changes and trends that we can report back to our government clients.

4.4 Client provision of input into the collections processes.

CBE believes the key to working together depends on timely and honest communication. CBE requests that the DOR assign IT resources to provide test files and work with our IT staff to resolve any issues. The more information provided to CBE during placement, the more quickly we can begin collection activities.

CBE has experience implementing some of the nation's largest government and private-sector clients, demonstrating our ability to implement complex programs quickly and effectively. Our team puts the necessary resources in place to implement all the elements of a new program quickly, thereby minimizing the resources they need to commit in support of the implementation.

The most common issues found after the Go-Live date tend to be undisclosed client requirements. In the event an issue arises, it is addressed in an expedited manner with a dedicated Go-Live staff. Our focus, along with the client, will be to identify root cause, define, develop, test, and implement the right solution.

4.5 Audits by the client

CBE is audited on a regular basis for compliance with many security standards, including ISO27002, IRS Publication 1075, PCI compliance, NIST 800.53, and HIPAA/HITECH. We are audited on a regular basis by clients, both onsite and remotely. Most of our clients have access to CBE WebVision so they can review accounts at any time.

Additionally, we conduct intensive internal audits on policies and procedures, client requirements, and consumer protection compliance.

In this manner we will add, update, and remove items from customer's credit reports. As required under the Fair Credit Reporting Act (FCRA), if we receive written or verbal notification that the consumer is disputing the account, we will notate the account accordingly.

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

CBE has the necessary resources and experience to handle many different situations, including out-of-state collections, litigation, and lien enforcement.

OUT-OF-STATE COLLECTIONS

Because of our standing as an agency with national reach, CBE has the resources to pursue collections for out-of-state consumers. We are licensed to collect in all states that require such documentation, as well as Puerto Rico, the U.S. Virgin Islands, and Guam. Our collection associates are scheduled to sufficiently cover all U.S. time zones.

LITIGATION

In order for CBE to recommend litigation to the client, the following stipulations must be satisfied and documented by our internal Litigation Department:

- The total balance of accounts to sue must be \$1,000 or more (may vary by state and client requirements)
- The account must have been in our office more than 30 days, so the first notice with validation and the FDCPA-required disclosures have been sent.
- The taxpayer must have a street address or employment address at which they can be cured and papers served
- The taxpayer must have verified assets and/or employment
- Litigation costs will not exceed the amount that can be recovered

Upon determining that an account is qualified for litigation, CBE forwards an Authorization to File Suit form to the client. Upon receipt of signed, written approval, we begin the legal process.

LIEN ENFORCEMENT

CBE has many years of experience in handling lien enforcement. When authorized, CBE will use our legal resources to obtain a court judgment. Once this is obtained, the county places a lien on the property or real estate.

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.

CBE has read and understands this requirement.

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

Collection associates are stack ranked based on percent- to-goal, with the top 50 percent earning commissions. Each associate's quality score impacts where they finish in percent-to-goal. Hitting quality objectives can increase their percent to goal by up to five percent, while failing to meet targets can decrease their percent- to-

goal by as much as 10 percent. As an example, a collections associate can finish at 100 percent to goal, but fail to meet the quality objective, so the percent-to-goal is reduced to 90 percent (-10%). Supervisor compensation is based on five percent of the potential payout, based on their team's quality score.

Agents receive the following performance incentives:

- ✓ **Visual:** High profile display board showing names of exceptional performers (KPI/kudos calls/attendance)
- ✓ **Auditory:** Announce high performers at our weekly floor-wide site meetings, as well as have a Top 5 board where we broadcast who had the best stats for the previous day; these recognitions include: Top Collector, Top Productivity, Top Conversion and Most Reconnections
- ✓ **Personal:** Tokens of appreciation from leadership: small non-monetary rewards and kudos emails sent to two agents a week recognizing them for their improvements or accomplishments
- ✓ **Games and contests:** Top-performing agents can receive pizza parties, best team and most improved team awards, and we also offer a league lunch to our staff (a collections goal is set and any agent who meets or exceeds the target receives lunch from his or her management team); Team Captains come up with other games and contents to keep the staff engaged on a daily, weekly and monthly basis
- ✓ **Individual:** Higher position of stack rank ahead of shift bids
- ✓ **Development:** Additional time to act as floor support within team or assist in stretch assignments
- ✓ **Monetary:** Monthly monetary incentive program that is rewarded based on scorecard performance

Describe 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.

CBE's preferred direct payment reporting method is daily through an automated file sent to CBE that our collection system can process automatically.

CBE prefers to withhold the agency fees for direct pays from the monthly client remit. The detail for the fee withheld would be included on the monthly invoice that we publish to our client access portal. In the event that were not enough payments collected at CBE to cover the agency fee due from Direct Pays, the invoice would detail the amount due to CBE.

6.2 Account cancellations or recalls from the client.

The DOR may recall an account via a maintenance file, phone call, or email. Upon receipt of a recall request, the account is changed to "Requested Closed by Client", and all collection activity will cease. If we have a keep process in place and a payment arrangement is set on the account, we will request to keep the account for an additional pre-determined period of time.

If an account has been returned to the DOR, CBE ceases all collection efforts. A request for removal is submitted to the credit bureaus, if CBE has credit reported the account.

Payments received on a closed account will be sent back to the consumer, along with a letter stating to contact the DOR as the account was returned.

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

CBE will work with the DOR to establish a goal for recoveries resulting from an amnesty program. Typically, CBE takes a very small percentage of that as our fee. This percentage is typically escalated once the mutually established goal is reached. CBE realizes that the DOR's amnesty advertising will drive a great deal of the recoveries.

In general, CBE works with our government clients to determine which payments are commissionable, and we then program our collection platform accordingly.

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

CBE will maintain a trust account client with our preferred bank for the exclusive deposit of the DOR's collected funds.

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

CBE uses our leading-edge analytics as collection leverage tools to generate **successful recoveries**, including but not limited to:

- ✓ **Collection Letters** - Letters are automatically generated by our collection platform and diplomatically persuade taxpayers to pay their debt in full.
- ✓ **Dialing Strategies** - Dialer use increases call center performance, enables CBE to remain in compliance with collection regulations, and can be tailored to the DOR's portfolio.
- ✓ **Phone Scoring** - We score phones on their ability to be contacted in order to drive earlier recoveries and aid in resolution time and faster recoveries.
- ✓ **Scoring** - Our proprietary scoring strategies enable CBE to focus resources on accounts with the highest probability of liquidation.
- ✓ **Effective Negotiation** - CBE's trained collection associates are respectful and diplomatic when communicating with taxpayers, ensuring a superior experience.
- ✓ **Credit Reporting** - When permitted by regulations and the client, credit bureau reporting is an effective method of motivation to convince the taxpayer to pay their debt.

CBE's tailored approach focuses on pursuing payments efficiently and effectively in a manner that is most convenient for the taxpayer, ensuring an optimal and compliant experience.

Innovation in Performance Technologies

From systems to data, CBE has chosen to create our own solutions because we want next-generation tools. CBE built our own collection platform (**cat.i CORE™**); we created custom algorithms for real-time call monitoring technology, and we created **LocateSmarter®**, a separate skip tracing company utilized by CBE and some of the largest collection agencies in the United States.

CBE’s in-house technology development allows us to add value no one else can – from lower wrong number rates to the independence gained by our unique ability to customize our systems – which means we can recover more while calling less, generating more revenue and less risk for the DOR.

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

Our best practices directly impact our public sector clients’ receivables management programs through the following:

- Our skip tracing technology and data analytics ensures we have extremely high Right Party Contact rates, allowing us to talk to taxpayers sooner than any other agency.
- High Right Party Contact rates also translate into very low complaint rates and a top-quality taxpayer experience
- CBE’s proprietary LocateSmarter technology identifies more taxpayers sooner, resulting in fewer mistakes and allows us to efficiently begin our contact strategies. LocateSmarter provides high quality data, rather than just large quantities of data, which reduces the risk that CBE will inadvertently contact the wrong third parties.

Fundamentally these improved outcomes are good for performance, but they also meaningfully improve taxpayer experience. If we can get to the right party quickly and more efficiently, that makes each taxpayer feel better about how we operate.

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.

CBE does not outsource any core collection activities. CBE uses third-party vendors for functions such as letter production, phone scrubbing and scoring, and data sources for skip tracing. Vendors are identified in the following table.

CBE Suppliers	
RevSpring	Letter printing and mailing services
TransUnion	Scoring and consumer location services
LexisNexis	Consumer location services
LocateSmarter	Consumer location services
LiveVox	Dialer platform Call monitoring and recording
CallMiner	Speech analytics and interaction analytics

Interactive Marketing Solutions	Cell phone scrub services
Experian	Credit reporting services
CBS Innovis	Credit reporting services
Equifax	Credit reporting services

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

CBE electronically exchanges encrypted client data, including account and payment files. Files are exchanged on a daily, weekly or monthly basis via the most up-to-date, secure method, SSH File Transfer Protocol (SFTP). Using SFTP transfer provides both entities with the best form of security and reliability. CBE can also access data from the DOR's own SFTP site if preferred. CBE can discuss accepting electronic placements in various formats if necessary.

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.

CBE feels that there is no one single type of collections level that we generally perform best at. Our performance is based on several factors, including the age of the account, account balance, work standards, and the amount of work done internally by the client.

CBE has been performing collection services to the public sector for more than 30 years. CBE's decades of experience in government and income tax collections work provides a powerful foundation of technology, leadership, compliance, and best practices that we apply to each one of the contracts we serve. From that experience, we know that no two contracts are the same, and more importantly know that work efforts often need to be changed and refined over time given seasonal externalities and portfolio changes. For the DOR's contract, we will draw from our experience with the IRS and other government clients as we customize our collection procedures to deliver excellent recovery results while preserving the utmost taxpayer experience.

CBE is one of four trusted partners to the IRS and we provide focused, flexible management and a motivated workforce with a history of top performance and integrity, as demonstrated by greater than 99% scores on IRS taxpayer satisfaction.

Our diverse footprint gained through partnering with many types of private and public businesses gives CBE a unique perspective and the experience needed to utilize best practices across all segments. It also helps us effectively evolve and adapt in order to meet the diverse needs of our clients.

12.1 Describe the types of managed service capabilities.

CBE does not manage our clients' IT systems.

We update accounts as new actions are taken or new information is made available, including payments made, status changes and new information. This information will be communicated to the DOR through reports and via our secure client portal, WebVision.

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

Members of Operations Management, Organizational Development, Quality Assurance and Compliance monitor collection associate's phone calls with customers. A minimum of five calls per collection associate of varying call durations are selected for monitoring. We analyze each call for quality assurance and compliance with documented standards. CBE utilizes speech technology to extract meaningful business intelligence from recorded calls by utilizing indicators of stress, excess silence, or other signs. This assists CBE in promoting an optimal outcome for the collection associate, the taxpayer, and the DOR.

CBE's use of speech analytics allows us to improve performance and compliance for the DOR by:

- Monitoring spoken words, omissions, and tone
- Identifying patterns and characteristics that result in successful calls
- Facilitating targeted training to incorporate best practices and/or when a weakness or deficiency is identified
- Allowing us to document all regulatory disclosures or client-based requirements
- "Inspecting what we expect" from every associate
- Lowering risk of non-compliance and costly litigation risk factors

CBE records 100 percent of our calls; those calls are archived for up to seven years, including manually dialed accounts.

CBE's proactive and innovative technology solutions allow us to fully deliver all specifications and activities listed in the Scope of Service. Our continual investment in technology development is maintained through a large, in-house IT team.

CBE uses the [LiveVox](#) platform for call recording and monitoring. While many agencies may promote analysis of data, trends and strategy, CBE's tangible daily application of analytic resources, such as [CallMiner](#), enhances strategies for our government clients.



CallMiner is the speech technology tool we use to translate voice recordings into transcripts and apply categorical information to the calls. Resulting call metrics are used to enhance our customer service and provide an enhanced taxpayer experience. They also contribute to compliance monitoring efforts by ensuring CBE is completely adhering to all relevant regulations. This will create an impact to the DOR, as our analytics enable us to provide useful insight and feedback regarding your taxpayers and the account statistics associated with them.

CBE’s unique capabilities allow us to deliver leading performance for government clients without generating complaints or risking your reputation. We make continual investments in our biggest strengths: speech analytics, training, enhanced strategies, powerful scoring tools, and robust security measures. These initiatives enhance CBE’s ability to provide top-quality service to taxpayers.

Weekly meetings are held to review 100 percent of the calls flagged with potential complaint language. These CallMiner call reviews, in addition to call monitoring and procedural reviews, are directly tied to the associate’s incentive program, further demonstrating our commitment to quality.

Additionally, CBE uses the following technology resources to drive performance output:

CBE Technology Resources	
<p>cat.i (Custom Account Tracking Intelligence) Proprietary Account Management System</p> 	<p>CBE’s proprietary collection software is a powerful, flexible, and highly scalable system that uses intelligent decision-making to support effective operational strategies. cat.i allows CBE to manage account inventory in real-time. Accounts move through established workflows, which change when new information becomes available. The system stamps each account with the user’s identification code every time the account is worked or viewed.</p>
<p>WebVision Online Account Access</p>	<p>CBE’s clients have access to WebVision, our proprietary client access website designed to view accounts and download standard reports, invoices, and other documents from CBE. This resource was designed to provide a compliant, secure client access website that allows our clients to view accounts in real-time.</p>
<p>Paycbegroup.com Online Payment Portal</p> 	<p>Our custom payment portal, paycbegroup.com website allows consumers to make a payment on their accounts by check, debit, or credit card 24 hours a day, seven days a week.</p>
<p>LiveVox Human Contact Initiator (HCI) Manual Dialing Platform</p>	<p>To eliminate TCPA compliance risk, CBE uses the LiveVox Human Contact Initiator (HCI) for all outbound dialing. HCI provides human intervention which initiates each call. The manual dialing process does not utilize predictive algorithms or random or sequential number generators.</p>

CBE Technology Resources

<p style="text-align: center;">LocateSmarter Proprietary Skip Tracing Platform</p> 	<p>Skip tracing is primarily performed through our patented, highly sophisticated and refined LocateSmarter automatic skip trace waterfall process, designed to identify and locate even the hardest to find constituents. The process is an important component in the success of our collection process, and our unique approach gives us a competitive advantage over other collection agencies. Associates also access other premium online search tools including Accurant, LexisNexis, and Innovis to locate constituents.</p>
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CBE is proud to announce we have been awarded Receivables Advisor magazine’s **2019 Top Innovative Agency** award. Our dedication to the development of innovative, next-generation tools will enhance our service offerings to the DOR.



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.

Based upon the DOR’s requirements, interest updates are calculated and added on a daily basis to ensure that we have the most current payoff balance when speaking with the taxpayer.

We understand Interest is currently calculated at five percent on the unpaid tax balance (not including penalty or interest) from the statutory due date of a filed return or the assessment date from an internal assessment to a taxpayer’s account.

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

Yes. CBE has been performing collection services to the public sector for more than 30 years. CBE’s decades of experience in government and income tax collections work provides a powerful foundation of technology, leadership, compliance, and best practices that we apply to each one of the contracts we serve.

Our top-quality work with the three largest federal collections contracts, **The Internal Revenue Service**, the **U.S. Department of the Treasury Bureau of the Fiscal Service** and the **U.S. Department of Education**, exemplify our demonstrated ability to achieve competitive collection rates on large volume contracts

We know that no two contracts are the same, and more importantly know that work efforts often need to be changed and refined over time given seasonal externalities and portfolio changes. For the DOR’s contract, we will draw from our experience with the IRS and other government clients as we tailor our collection procedures to deliver excellent recovery results while preserving the utmost taxpayer experience.

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

CBE understands the DOR requires that taxpayers or their representatives contact the DOR directly with these questions.

17.1 Describe how settlements presented by taxpayers are handled.

CBE's philosophy is to use settlements as a negotiation tool during the course of the talk-off once we receive permission from the DOR. If the taxpayer indicates the balance or minor issue is the reason for non-payment, the collection associate volunteers a reduction to resolve immediately.

CBE's experiences show settlements increase overall recovery. A settlement option in primary placement proves most cost effective for clients due to greater potential fees to agencies in later stages.

Aside from cost benefits, a settlement option can provide additional value to the DOR. A first contact resolution heightens brand protection. If a taxpayer is able to resolve a matter early on, it will eliminate repeated calls.

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

CBE has experience implementing many complex private-sector and government clients, demonstrating our ability to onboard clients quickly and effectively. Our team puts the necessary resources in place to smoothly implement all the elements of a new program, while minimizing the resources our clients will need to commit in support of the implementation. Our implementation process will proceed more efficiently with involvement from the DOR's IT resources so that our teams can work together to resolve any issues. We also ask for all program work requirements to be communicated up front during our onboarding meetings.

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.

If a taxpayer disagrees with the collection amount, either the entire amount or portion of the amount, and volunteers new information, the collection associate will note this on the account, along with the reason why the taxpayer believes the collection amount is incorrect. CBE's Client Relationship team will suspend collection on the account and send the new information and explanation to the DOR. If no response is received from the DOR within 30 days, CBE will follow up for resolution. If the DOR validates the new balance owed, the account status is changed back to active, and a "Debtor Validation" letter is sent to the taxpayer. CBE proceeds with collection activity, if permission for such action has been granted by the DOR.

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?

CBE updates taxpayer accounts as new actions are taken or new information is made available, including payments made, status changes, and new information. We can communicate those changes in reports to the DOR and through our client web portal, WebVision.

WebVision is CBE's secure client access website designed to view accounts and download standard reports, invoices, and other documents from CBE in real time.

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.

CBE typically remits collected monies to our clients on a monthly basis. If a more frequent remittance is preferred by the DOR, CBE would be happy to discuss this with you. We prefer a net remittance of funds, but we will adhere to DOR's preferred method of remittance.

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.

CBE's remittance indicates the account identification number, check number, date, taxpayer payment amount, our contingency fee, the amount being remitted, and the payment type. We can provide the remittance electronically on a schedule of your convenience.

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

CBE continues to be a thought leader in the collections industry, and our management staff and operational blueprint drive innovation daily to meet industry changes and challenges.

CBE's headquarters are located in Cedar Falls, Iowa, which is only a few hours away from the DOR's offices. This close proximity means we understand and share Nebraska's demographics and culture. As neighbors, we understand the nuances of Nebraska's economy, and we are able to apply this knowledge to implement practices and generate maximum recoveries for the DOR.

1. CBE is always innovating to address challenges head-on. Today we are in active development of a communication modernization project that will allow us to work the taxpayer and afford them the communication option they prefer.
2. CBE is continuously evaluating our methods of attracting top talent with competitive salaries. We also look at the appropriate balance of collector-driven interactions versus technology-driven interactions. CBE is consistently recognized as a "Employer of Choice" in the Waterloo-Cedar Falls region, as well as one of Iowa's Top Workplaces, as listed by Workplace Dynamics.
3. Our robust compliance architecture is designed to adhere to all local, state, and federal regulations and eliminate complaints. CBE uses our proprietary skip tracing tool, LocateSmarter, to reduce the amount of wrong numbers, which is the top reason for consumer complaints. The DOR will benefit from CBE's values, compliance initiatives, training, and investments through an enhanced taxpayer experience and increased recoveries.
4. We are addressing scamming and spamming activities using Neustar technology. Through Neustar's Trusted Brand Management / Caller Name Optimization program, we register our caller ID numbers with the four major wireless carriers (AT&T, Sprint, T-Mobile, Verizon Wireless). This registration prevents our numbers from being listed as suspected spam or scam calls on those networks. Additionally, taxpayers who subscribe to their carrier's premium caller ID feature will see "CBE Group" displayed as the caller name on incoming calls from our registered numbers. Since our implementation

of this technology, we have seen an increase in answer rate of 12.5 percent during our initial 60-day testing period, which means collection associates can service the DOR's accounts more efficiently.

5. CBE's partnerships with leading technology providers allows us do things the right way. This is exemplified in our compliance record with the IRS, as well as excellent taxpayer satisfaction rates. We have cutting-edge technology in place to mitigate and protect against legal risk from the litigious nature of the industry, such as scrubbing databases, call analytics, quality monitoring, and TCPA Compliance Solution tools. CBE has adapted to understand the unique concerns of public-sector clients.

24.1 Describe other options the solution could provide.

CBE can provide additional contact center outsourcing services to the DOR, including first-party collections, and customer care.

Our collection strategies and technology investments focus on the number of times it is necessary to "touch" and contact a taxpayer. The technology and communication modernization project we referenced earlier are designed and tailored to do just this, affording taxpayers the ability to engage us in the manner most efficient for them. Additionally, our skip tracing tools, strategy, and approach are designed to do get us in contact with the taxpayer in the fewest "touches" and attempts as possible. CBE is poised to invest in other opportunities to enhance this process and improve the overall taxpayer experience.

CBE offers the following unique qualifications to the DOR:

- 1 Unrivaled Credibility**
CBE has been providing outsourced call center solutions for more than 85 years; our diverse footprint throughout collection space industry groups gives CBE a unique perspective and the experience needed to utilize best practices across all segments, and helps us effectively evolve and adapt in order to meet the diverse needs of our clients.
- 2 Cultivating Personal and Professional Growth**
We nurture a career culture of developing our people into leaders, offering diverse opportunities to employees and empowering those who have committed their careers to supporting and serving CBE's clients.
- 3 We Find a Way to do the Right Thing**
We lead performance excellence through our commitment to doing the right thing; from strategic and innovative receivables management solutions to our trailblazing approach to regulatory compliance, we set industry expectations because we're not afraid to do things the right way, even if it's not the easy way.