

MEMORANDUM

TO: Public Safety Committee

FROM: Justina J. Ferber,  Legislative Analyst

SUBJECT: **Briefing – OIG Report Number 14-003**
Department of Liquor Control
Review of Management Controls over Inspectors

Those expected for this discussion:

Edward L. Blansitt, III, Inspector General
George Griffin, Director, Department of Liquor Control
Kathie Durbin, Chief of Licensure, Regulation and Education, DLC

The Inspector General (IG) will provide a brief overview of OIG Report Number 14-003 dated January 13, 2014. The report addresses the Inspector General's inspection and review of practices of the County Department of Liquor Control on the conduct and management control over County Alcohol Inspectors in the Division of Licensure, Regulation and Education. The report includes three findings and one recommendation. A copy of the IG's bullet points for this briefing are attached at ©1. The report is attached at ©3.

The report included three findings and one recommendation.

- Finding 1: DLC has improved internal controls over its inspections since 2011. However, management controls over the activities of inspectors remains weak.
- Finding 2: The data analyzed by the OIG indicate that there was a disproportionate number of violations by Hispanic establishments in 2011, but this did not occur in subsequent years.
- Finding 3: The acquittal rate of Hispanic establishments before the Board of License Commissioners was not significantly different from the acquittal rate for other licensees.

IG Recommendation: Data available from the iPad system should be used to develop management reports for monitoring and managing inspections.

- **Supervisors of inspectors should regularly receive and review reports showing inspections, by type, conducted by each inspector daily, weekly, monthly, quarterly and annually.**

- **The reports should identify the places each inspector has been and the nature of any violations found.**
- **The reports should measure compliance with all inspection requirements set by State law.**

The CAO and DLC Director concurred with the recommendation and notified the IG on December 23, 2013 that DLC had instituted improved controls. In addition they advised that DLC had been developing the requirements for an enhanced database management system and was working with the Office of Procurement to issue a Request for Proposal (RFP) for the system.

The DLC Director will discuss with the Committee the IG's report, specifically, how the proposed database management system will address the IG's recommendation to use the iPad system to develop management reports for monitoring and managing inspections.

The IG stated in his report that the RFP for the new system had been held up in procurement and Councilmembers have expressed concern about the delay in the Office of Procurement. Council staff has determined that DLC has been working on the RFP with the Office of Procurement since FY13. The RFP was issued on Friday, March 28, 2014, and a pre-submission conference is scheduled for April 11. Bidding opens on April 28. Attached at ©14 are excerpts from the solicitation.

A cursory review of the RFP shows that the proposed database management system will track various types of data generated by the Division of Licensure, Regulation and Education and provide a comprehensive database management system for the Division. The RFP calls for the tracking of the following types of information:

- complaints, violations and compliance checks for alcohol and tobacco
- inspection data and notifications to inspectors
- license application and renewal process including license transfer and specials events
- licensee information and historical data
- fees, fines and hearings including printing of receipts and hearing notices
- notifications and correspondence including mailing labels, reports and queries
- class registration and participation

This packet contains:

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Office of the Inspector General
Department of Liquor Control: Review of Management Controls over Inspectors

Introduction and Background

- In March 2012, soon after a DLC inspector was arrested and charged with extortion, the OIG received complaints from owners of Hispanic restaurants:
 - Owners complained that the inspector threatened to issue alcohol violation citations to them based on false findings.
 - Owners complained there was bias by DLC and the Board of License Commissioners.
- The inspector later pleaded guilty to misconduct in office.

Objectives

We conducted this targeted inquiry in order to:

- determine whether DLC has subsequently implemented improved management controls that could reasonably be expected to prevent and detect misconduct such as that of the former inspector.
- determine whether the complainants' allegations of bias on the part of DLC and the County Board of License Commissioners could be substantiated.

We did not investigate the individual actions of any current or former inspector.

With respect to management controls, we found that DLC has improved controls over its inspections since 2011. However, management controls over the activities of inspectors still need improvement.

- Prior to 2012, all citations were documented on unnumbered paper forms.
 - Potential inspector misconduct was facilitated by the ability to create citations without turning the forms in to DLC.
- To address this vulnerability,
 - DLC put an iPad citation system into use in early 2012. Once a citation is completed, it cannot be deleted by the inspector.
- Despite improved controls, the iPad system is not used to generate timely, useful management reports on the activities or performance of inspectors. Supervisors of inspectors do not regularly receive and review periodic reports showing:
 - the places each inspector has visited,
 - the type of inspections conducted or
 - the nature of any violations found
 - compliance with all inspection requirements set by State law.

Recommendation:

Data available from the iPad system should be used to develop management reports for monitoring and managing inspections that address the weaknesses we identified, specifically:

- Supervisors of inspectors should regularly receive and review reports showing inspections, by type, conducted by each inspector daily, weekly, monthly, quarterly, and annually.
- The reports should identify the places each inspector has been and the nature of any violations found.
- The reports should measure compliance with all inspection requirements set by State law.

DLC told us they are working on procuring a database management system that would use data from the iPads.

Regarding the allegations of bias, we found a disproportionate number of violations by Hispanic establishments in 2011, but not in subsequent years.

Appropriately, we did not find the race or ethnicity of licensees in the DLC database. Instead we used the names of establishments to identify local establishments serving Hispanic cuisine, and made the assumption the owner/licensees would be Hispanic.

- In 2011, those Hispanic establishments accounted for 27% of the violations, but only 13% of the licensees.
- The % of violations by those Hispanic establishments declined to 17% in 2012, and to 14% in the first half of 2013.
- This decline coincided with, but cannot be directly attributed to, the departure of the inspector in question, in early 2012.

We also found that the acquittal rate for Hispanic establishments before the Board of License Commissioners was not significantly different from the acquittal rate for other licensees.

- Almost all licensees whose citations were heard by the BLC in 2011, 2012, and the first half of 2013 were found guilty (53 out of 55 total), so there was no indication of bias against any group.

Accordingly, we made no recommendations regarding the latter two findings.

Summary of Chief Administrative Officer's Response

- The CAO concurred with our recommendation and stated that they have started to implement this improved level of management control.



BLL

OFFICE OF INSPECTOR GENERAL

January 13, 2014

MEMORANDUM TO: Hon. Craig Rice, President, County Council
Hon. Isiah Leggett, County Executive

FROM: Edward L. Blansitt III 
Inspector General

SUBJECT: Final Report – *Department of Liquor Control: Review of Management Controls over Inspectors*

In accordance with reporting requirements set forth in §2-151(k) of the County Code, our final report on *Department of Liquor Control: Review of Management Controls over Inspectors* is enclosed. This report is being provided to you, confidentially, in advance of our intended public issuance of the report on Friday, January 17, 2014.

Our report recommends actions that should be undertaken by the Department of Liquor Control.

The Chief Administrative Officer's (CAO) response is included in our report. The CAO concurred with the report's recommendation.

We appreciate the efforts and assistance provided by the staff of the Department of Liquor Control during our review. If you have any questions, please contact me at (240) 777-8241.

Attachment

cc: County Council Members
Timothy Firestine, Chief Administrative Officer
George Griffin, Director, Department of Liquor Control

FINAL REPORT OF INSPECTION

**Department of Liquor Control:
Review of Management Controls
over Inspectors**

OIG Report Number 14-003

January 13, 2014



**Montgomery County, Maryland
Office of the Inspector General**

Office of the Inspector General

Department of Liquor Control: Review of Management Controls over Inspectors

January 13, 2014

Introduction

In March 2012, the Office of the Inspector General (OIG) received complaints from several owners of Hispanic restaurants in Montgomery County licensed to serve alcoholic beverages. The owners complained that during 2011 and early 2012 one inspector from the County Department of Liquor Control (DLC) had been visiting their establishments on a frequent basis and issuing or threatening to issue alcohol violation citations to them based on false findings. They also claimed that DLC and the County Board of License Commissioners demonstrated bias against them. At the time the OIG received the complaints, the inspector who was the subject of these complaints had been arrested for allegedly having extorted a Hispanic restaurant owner for \$1,000, in exchange for giving advance notice of future inspections and not submitting citations.

Objectives, Scope, and Methodology

This inquiry complements a broader review of DLC being conducted concurrently by the OIG. We looked into specific allegations we received regarding bias against certain licensees. We did not attempt to determine whether any of the citations issued by the former inspector were unwarranted, and we did not investigate the individual actions of any specific current or former inspector.

Our objectives in conducting this targeted inquiry were to:

- (1) understand what DLC controls over selected inspections existed prior to the arrest of an inspector in early 2012,
- (2) determine whether DLC has subsequently implemented improved controls,
- (3) evaluate the current controls to determine whether they could prevent and detect misconduct such as that of the former inspector, and
- (4) determine whether the complainants' allegations of bias on the part of DLC and the County Board of License Commissioners could be substantiated.

We interviewed DLC staff, analyzed alcohol licensee and violations data, observed County Board of License Commissioners hearings, met with owners of some Hispanic restaurants, and reviewed applicable laws and regulations.

We analyzed alcohol licensee and violations data to determine whether DLC disproportionately issued alcohol violation citations to owners of Hispanic establishments, as well as to determine whether the Board of License Commissioners has been finding a disproportionate number of Hispanic licensees guilty. We identified a licensee as Hispanic based on the name of the establishment.

Our inquiry was conducted from March 2012 through December 2013 in accordance with the standards contained in *Quality Standards for Inspection and Evaluation* issued by the Council of the Inspectors General on Integrity and Efficiency (January 2012).

Legal and Institutional Background

Maryland law requires that sellers of alcohol be licensed (with some small exceptions that do not apply to restaurants and stores in the normal course of business)¹ and provides that county boards of license commissioners may issue licenses to sell alcohol², suspend or revoke licenses³, and impose fines⁴. Maryland law also provides that counties may have liquor control boards that purchase and sell alcoholic beverages⁵; however, most county governments in Maryland have only license-issuing authority and do not participate in the sale of alcohol.

Montgomery County is one of the few counties in Maryland that participates in the sale of alcohol. The Montgomery County DLC has the powers of the liquor control board for Montgomery County⁶. The County has a warehouse and 23 stores for wholesale and retail distribution of alcoholic beverages. DLC controls the wholesale distribution of all beverage alcohol in the County and the retail sale in the County of all distilled spirits for off-site consumption, subject to one grandfathered exception.

The County Board of License Commissioners consists of five members appointed by the County Executive and subject to confirmation by the County Council⁷. The County Board of License Commissioners holds hearings on the issuance, suspension, and revocation of licenses and on the issuance of fines.

Under Maryland law, the county boards of license commissioners may have inspectors and administrative staff⁸. In Montgomery County, the inspectors and administrative staff have been part of DLC since fiscal year 2007, when the County Executive moved them from the Board of License Commissioners to a newly-created Division of Licensure, Regulation, and Education within DLC.

There are approximately 1,000 establishments licensed to sell alcohol in Montgomery County, in addition to the County owned and operated retail liquor stores. These include restaurants and stores that sell wine and beer.

DLC has five inspectors who inspect licensees for compliance with laws governing underage alcohol sales, sales to intoxicated individuals, keg registration requirements, and requirements that receipts from sales of food in restaurants be equal to or greater than receipts from alcohol

¹ Maryland Code, Article 2B §1-201.

² Ibid., §15-112.

³ Ibid., §10-401(a)(2).

⁴ Ibid., §16-507(q).

⁵ Ibid., §15-205.

⁶ Ibid., §15-201(a)(2).

⁷ Ibid., §15-104(c)(1).

⁸ Ibid., §15-112(a).

sales. A police officer and a DLC inspector go together for most compliance checks. If an inspector deems that there has been a violation, the inspector issues a civil citation⁹ to the licensee, with a copy sent automatically to the DLC Division Chief.

After an inspector issues a citation, the DLC Division Chief does one of the following:

- sends a letter to the licensee offering the licensee the opportunity to (1) admit the violation, (2) pay a fine or have its license suspended, and (3) waive the right to a hearing before the Board of License Commissioners, or
- puts the case before the Board of License Commissioners.

Further, the Division Chief has informed us that if a business receives an alcohol awareness violation and is able to produce a certificate within 24 hours, the violation is downgraded to a warning.

Upon receiving an offer to admit the violation, the licensee may:

- accept the offer and agree to the fine or suspension, or
- have the case heard by the Board of License Commissioners.

The vast majority of the licensees who are offered the choice pay the fine.

After a hearing, the Board of License Commissioners may find a licensee not guilty, suspend or revoke a license¹⁰, or impose a fine of up to \$20,000¹¹. Three members of the Board must be present to conduct a hearing. Each party at the hearing has rights to cross examine witnesses and to be represented by an attorney.

Finding 1: DLC has improved internal controls over its inspections since 2011. However, management controls over the activities of inspectors remain weak.

The DLC inspector was arrested and charged with extortion on February 16, 2012. The inspector was alleged to have extorted a Hispanic restaurant owner for \$1,000, in exchange for giving advance notice of future inspections and not submitting citations. The inspector pleaded guilty to misconduct in office and was sentenced to two years in prison, which was suspended. He was fined \$2,000, which was also suspended, and he was placed on three years of supervised probation. Although this was the only prosecution involving this inspector, the OIG received numerous allegations of other inappropriate actions by this inspector. (As DLC did not have data on citations by inspectors before 2012, the OIG did not try to quantify the activities of this inspector). The inspector's last day of work for the County was the date on which he was arrested.

⁹ Ibid., §16-408.

¹⁰ Ibid., §10-403(a)(1).

¹¹ Ibid., §16-507(q).

A DLC staff member told the OIG that when the inspector was arrested, completed paper forms for citations of certain licensees were found in his possession. He had not turned these forms in to DLC, and DLC had not previously been aware of them. The presence of these forms indicates that there may have been unreported extortion and/or the County may have been defrauded out of legitimate revenue.

Controls over Citations

Prior to 2012, all citations were documented on unnumbered paper forms. Potential inspector misconduct was facilitated by the ability of an inspector to create citations without turning the forms in to DLC. An inspector could visit a licensee without a police officer present and threaten a licensee with turning in the citation form if the licensee did not comply with the inspector's demands.

DLC has taken steps to address this vulnerability. DLC put an iPad citation system into use in early 2012, after the inspector was arrested. Inspectors now carry iPads with them on inspections and enter inspection and citation information into them. An inspector's iPad records the licensee visited and the time a citation is written. When a citation form is filled out, it is automatically sent to the DLC Division Chief and the supervisor of the inspectors. An electronic copy is also filed in the central database. Once the citation is completed, it cannot be deleted by the inspector.

In July 2013, the OIG met with some of the restaurant owners who made the original complaints. The complainants seemed satisfied with the new procedures for inspections at DLC. The restaurant owners also reported positively on the new inspector.

By collecting this data and by switching from the paper form system to the electronic system, DLC has improved controls over citations, greatly diminishing the vulnerability noted above.

Controls over Inspectors

Detection of inappropriate inspector conduct was made difficult in the past by the lack of information on individual inspectors' activities. Prior to 2012, inspectors were required to sign logs at the end of each work day, indicating their daily activities and businesses inspected. This system created vulnerability to the inspector's misconduct described above, as managers did not get information until after the inspector finished for the day, and analyzing information in many individual paper reports was not efficient.

Despite improvements, controls over inspectors remain weak. Although the iPad system gathers information on the times and places of inspections and citations, and the managers can see in real time when inspectors put information into the system, the data is not used to generate timely, useful management reports on the activities or performance of inspectors. The manager monitors inspectors' activities for each day from written messages that inspectors are required to send at the beginning and end of each day from their cell phones.

The OIG requested examples of reports from the iPad system and was emailed four spreadsheets, each for a different type of inspection. The inspector, licensee, and inspection result information appeared across multiple pages of each spreadsheet. Thus, it was very difficult to get an overall picture of individual inspector activity from the spreadsheets. After we told DLC that this was

our conclusion based on the spreadsheets, DLC provided us with an example report of an individual inspector's activity. We understand that DLC compiled this report from data in the iPad system. Since the compiled report identifies locations visited, but only selected activities and neither the dates nor the times visited, it does not adequately explain inspector activity and does not facilitate management. Accordingly, this did not change our conclusion.

A DLC staff member emailed the OIG that the iPad system is a "make shift solution," and the "RFP [Request for Proposals] for the new system has been held up in procurement." DLC has drafted an RFP for a database management system that would use data from the iPads. The County Procurement office has begun processing the RFP but has not put it in place.

Recommendation:

Data available from the iPad system should be used to develop management reports for monitoring and managing inspections:

- Supervisors of inspectors should regularly receive and review reports showing inspections, by type, conducted by each inspector daily, weekly, monthly, quarterly, and annually.
- The reports should identify the places each inspector has been and the nature of any violations found.
- The reports should measure compliance with all inspection requirements set by State law.

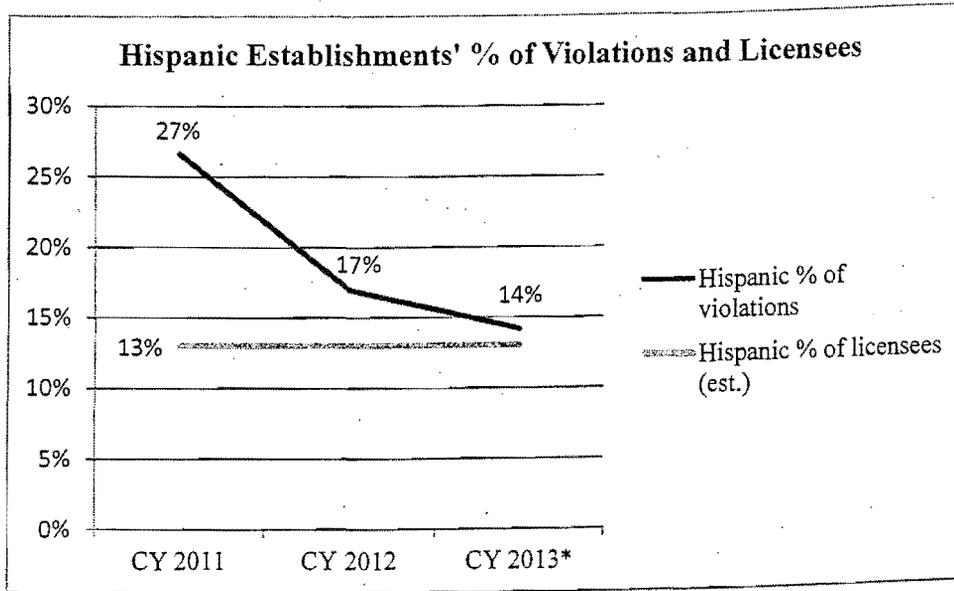
Finding 2: The data analyzed by the OIG indicate that there was a disproportionate number of violations by Hispanic establishments in 2011, but this did not occur in subsequent years.

We did not find any DLC data categorizing licensees by ethnicity, and DLC advised us that they do not have this data. We identified each licensee as Hispanic or not, based on the name of the establishment.¹²

DLC's violations data demonstrate that Hispanic establishments were disproportionately issued citations in calendar year (CY) 2011. The data show that the percent of violations by Hispanic establishments was out of proportion to the percent of licensees that were Hispanic establishments in CY 2011, but not in later years. See Chart 1.

¹² We identified an establishment as Hispanic if the establishment's name contained Spanish, referred to Hispanic food, or referred to a location in a predominantly Spanish speaking country. We did not include national chain restaurants of which we were aware. We recognize that not all establishments that we identified as Hispanic necessarily were under Hispanic ownership.

Chart 1



*through June 2013

Sources: OIG compilation of violations and licensee data provided by DLC. The OIG identified Hispanic establishments and all other licensees, some of which received citations. The OIG identified the June 2013 Hispanic establishment % of licensees and used that as an estimate for prior years.

In 2011, Hispanic establishments accounted for 27% of the violations, but only 13% of the licensees. In 2012, the percent of violations by Hispanic establishments fell to 17%, and in 2013 it fell further to 14%, which is virtually the same as the Hispanic establishments' percent of licensees.

In 2011, there were in total 234 fines of licensees, for a total dollar amount of \$229,097. Hispanic establishments received 60 of these fines, for a total dollar amount of \$44,573. It is estimated that Hispanic establishments would have paid roughly half of that amount, had they been fined at the level expected based on their representation among all licensees (13%).

In allegedly extorting an owner of a Hispanic restaurant and targeting others, the inspector who pleaded guilty to misconduct (who was himself Hispanic) could take advantage of any lack of familiarity with the rules and any language barrier. We could not determine from available data the extent to which his activities accounted for the disproportionate effect on Hispanic establishments. However, when that inspector left DLC, the percent of violations by Hispanic establishments fell to the expected levels.

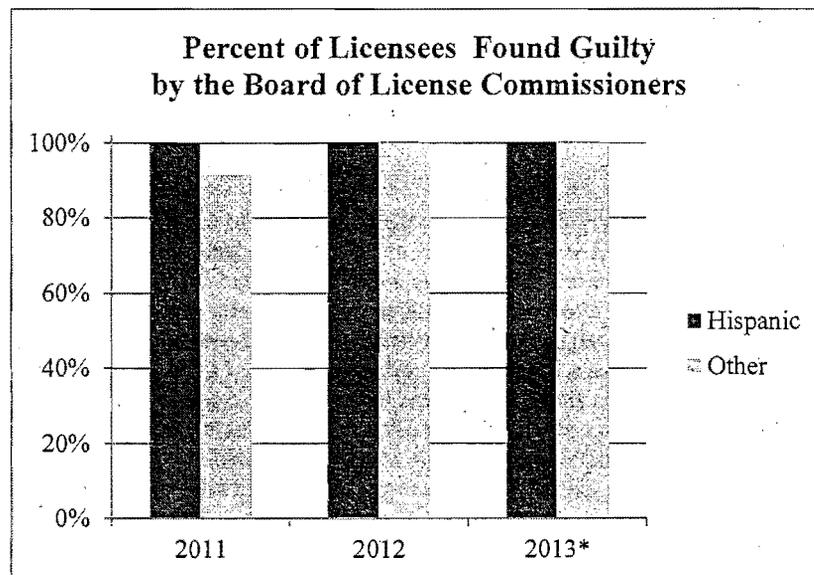
We make no recommendations regarding this finding. It does not appear that Hispanic establishments were cited disproportionately after 2011. Further, DLC does not collect information that would be necessary to monitor whether the ethnicity of licensees is a factor in the citations.

Finding 3: The acquittal rate of Hispanic establishments before the Board of License Commissioners was not significantly different from the acquittal rate for other licensees.

Almost all licensees whose citations were heard by the Board of License Commissioners were found guilty. Licensees were found not guilty in only 2 cases out of the 55 in total that were decided during calendar years 2011, 2012, and 2013 through June 20. While the data are consistent with the Hispanic restaurant owners' concerns that Hispanic licensees were very unlikely to succeed before the Board of License Commissioners, the data show that other licensees were equally unlikely to succeed. See Chart 2.

There was a small difference in the outcomes for Hispanic establishments and other licensees in calendar year 2011, when 100% of the Hispanic establishments were found guilty, compared to 91% of other licensees. However, the numbers of observations are small (8 Hispanic establishment and 23 other licensee hearings in 2011), and this difference is thus not significant. More recently, in calendar years 2012 and 2013 through June 20, there was no difference in the outcomes of the hearings: all licensees charged, Hispanic or not, were found guilty.

Chart 2



*through June 20, 2013

Source: OIG compilation of Board of License Commissioners hearing data provided by DLC. The OIG identified the Hispanic and other licensees.

We found no evidence of bias at the Board of License Commissioners.

We have no recommendations regarding this finding.

Summary of Chief Administrative Officer's Response

The response of the Chief Administrative Officer (CAO) to the final draft report is included in its entirety in Appendix A. The CAO concurred with our recommendation.

Appendix A



OFFICE OF THE COUNTY EXECUTIVE

Isiah Leggett
County Executive

Timothy L. Firestine
Chief Administrative Officer

MEMORANDUM

December 23, 2013

To: Edward L. Blansitt III, Inspector General

From: Timothy L. Firestine, Chief Administrative Officer *Timothy L. Firestine*

Subject: Final Draft Report, "Review of Department of Liquor Control's Management Controls Over Inspectors"

I am in receipt of your memo dated December 5, 2013, regarding your inspection and review of practices in the County Department of Liquor Control relating to the conduct and management control of County Alcohol Inspectors. We thank you for your efforts in reviewing this issue.

The Office of Inspector General undertook this review in response to the unfortunate and unacceptable breach of trust exhibited by one former Alcohol Inspector. When the alleged misconduct by this individual was discovered, we acted quickly and decisively where he was arrested and immediately relieved of his duties, and subsequently dismissed from the County workforce and prosecuted. I am pleased that subsequent reviews of this incident, including yours, have confirmed that this abuse of office was confined to one individual DLC employee during a limited time period, and is not a systemic, more pervasive problem among County employees. I am also very pleased to know that your analysis indicates there is "no evidence of bias at the Board of Liquor Commissioners," and there is no evidence of discrimination by DLC employees toward minority-owned and operated licensed establishments.

Here is our response to the one Recommendation offered in your report.

IG Recommendation: Data available from the iPad system should be used to develop management reports for monitoring and managing inspections.

CAO Response to IG Recommendation: We concur with this recommendation, and have already begun to implement this improved level of management control. During 2012, DLC reviewed the operational practices of inspections and the management oversight protocols relating to inspectors. As a result, as highlighted in this report's IG finding, this effort instituted improved controls. In addition, DLC developed the requirements for an enhanced database management system and currently is working with the Office of Procurement to issue a "Request For Proposal (RFP)" for such a system.

Edward L. Blansitt III, Inspector General

October 23, 2013

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As a point of clarification regarding your Finding #2, where it is noted that *“there was a disproportionate number of violations by Hispanic establishments in 2011, but this did not occur in subsequent years.”*, please be advised that the higher level of activity involving Hispanic licensees in 2011 is directly related to an increased level of enforcement and regulatory activity in the Wheaton business district during that time frame. This increased level of activity was in direct response to specific requests from the community and the MCPD. As a result of the arrest of the former inspector (charged with illegal activity related to work in the Wheaton area), DLC inspectors were re-deployed to other markets in the County while the investigation and internal review took place. This reduced level of regulatory activity in Wheaton is the direct cause of the reduced number of citations issued to Hispanic licensees during this subsequent time period.

Thanks again for your fair and thorough review and report of Department of Liquor Control's Management Controls over Inspectors. If you have any questions or need additional information please contact Fariba Kassiri at 240-777-2512 or fariba.kassiri@montgomerycountymd.gov.

TLF:fk

cc: Fariba Kassiri, Assistant Chief Administrative Officer
George Griffin, Director, Department of Liquor Control



OFFICE OF PROCUREMENT - SOLICITATION SCOPE & DOWNLOAD

Solicitation: 1028249 - Department of Liquor Control Licensure, Regulation and Education Case Management System

Scope: The Department is soliciting proposals for the purpose of acquiring a proven, integrated, and comprehensive web-based case management and tracking Commercial Off-The-Shelf (COTS) software or an otherwise already developed software solution that will be used to implement an updated and improved licensing, regulating, enforcement, training and accounting systems. The Department is seeking a mature and proven product that is configurable, scalable, and robust enough to handle potentially hundreds of concurrent transactions relative to managing license and licensee information. The system and applications that will make up the new solution for the remainder of this document will be referred to as the "Solution."

Download Solicitation: The solicitation and all amendments can be downloaded using one of the two options below. If you only want to view the solicitation, please select Option 1, and you will not receive e-mail or other communications regarding this solicitation. If you are intending to respond to this solicitation and would like to receive e-mail communications (including solicitation amendments) regarding this solicitation, please select Option 2. Regardless of what option you choose, it is still the responsibility of the bidder/offeror to frequently visit the Office of Procurement's website to obtain solicitation amendments.

OPTION 1

Click the link below to view and download the solicitation directly. You will NOT receive e-mail or other communications, including amendments, regarding this solicitation.

[Download Solicitation](#)

OPTION 2

Submit your contact information below to download the solicitation and receive e-mail communications regarding this solicitation.

E-mail:

Company Name:

Contact Name:

SECTION C - SCOPE OF SERVICES**1. BACKGROUND**

Montgomery County, Maryland is a dynamic and richly diverse community of nearly a million people residing in an area of close to 500 square miles. Montgomery County is Maryland's most populous jurisdiction and one of its most affluent. The 2011 estimated population according to the Census Bureau is 989,794 and the median household income 2007-2011 is \$95,660.

The Department of Liquor Control ("Department" or "DLC") is a department within the government of Montgomery County charged with providing licensing, wholesale and retail sales of beverage alcohol products, enforcement and education while promoting moderation and responsible behavior in all phases of distribution and consumption. Sales in FY 12 exceeded \$250 million dollars and the contribution to the General Fund (excess profit) exceeded \$28.5 million in the same time period.

The Department is divided in three divisions. One, the Division of Licensure, Regulation and Education, staffs the Board of License Commissioners, an independent body that grants licenses (currently 1,000 licenses) and imposes fines and penalties; performs inspections and testifies in hearings; and provides education and training programs relative to safe sales and service.

2. INTENT

The Department is soliciting proposals for the purpose of acquiring a proven, integrated, and comprehensive web-based case management and tracking Commercial Off-The-Shelf (COTS) software or an otherwise already developed software solution that will be used to implement an updated and improved licensing, regulating, enforcement, training and accounting systems. The Department is seeking a mature and proven product that is configurable, scalable, and robust enough to handle potentially hundreds of concurrent transactions relative to managing license and licensee information. The system and applications that will make up the new solution for the remainder of this document will be referred to as the "Solution."

The Department is keen to replace its current applications and tools that facilitate licensing, regulating, enforcement, education and related accounting activities with new functionality to the Department that allows for better integration and tracking of information and more comprehensive reporting. Overall objectives include, automating manual and paper driven processes; achieving seamless integration across all aspects of case management, acquiring an open architecture technology base that allows for future expansion of capability to meet changing and growing business requirements and increases in volume.

As a result of this initiative, the Department has documented its "as-is" business processes. While hoping to fulfill functional requirements and match process flows as closely as possible, the Department is willing to consider process reengineering to match a viable solution to the extent that the Department believes the process flow or outcome is not compromised.

The current legacy applications and tools manage license applications and renewals, consumer complaints, disciplinary actions, audits, and inspections but do not seamlessly handle all of DLC's business needs. The main objective of this effort is to deploy a new Solution that will meet all of the County's requirements. At a very high level, the Solution should:

- Use current technology that is configurable and customizable to create a Solution that meets functional and technical requirements
- Provide a web-based licensing interface that can seamlessly access related information and processes
- Enable configuration of an application that consolidates all licensing entities' licensing and regulation related activities, such as enforcement, education and accounting, into one application and database
- Provide a flexible enhancement path for future system upgrades
- Provide sufficient scalability and functionality to enable growth

Key drivers include:

- Need for a commercial off-the shelf (COTS) case management system
- Flexibility and integration of the Solution with current ERP system running Oracle EBS
- Ability to accommodate organizational growth and change using in-house programmers
- Flexibility and ease of use
- Case tracking
- Case security management
- Enhanced access to information
- Close to paperless environment
- Ability to generate standard and ad-hoc reports
- Ability to generate statements, letters, different types of licenses

Montgomery County, like other large organizations, utilizes a shared, mature and centralized IT infrastructure of which all departments including the DLC utilize. For example, the following are utilized by all departments within the County: Microsoft 2008 Active Directory, Symantec Net Backup, Microsoft SMS, Crystal Reports, Hyper-V, Microsoft Exchange, Sophos Anti-Virus. To a certain extent, almost all County departments utilize and share the same networking infrastructure. Unless the proposed Solution is fully or partially outsourced, the Offeror must be able to integrate their Solution into the Department environment. If the Solution requires the use of shared services, please refer to the Montgomery County Government Enterprise Architecture (Attachment Q).

Recognizing that this project will require significant commitment of Departmental resources, the Department has identified project personnel including functional and technical leads and subject matter experts, and has reassigned duties to provide personnel with specific time dedicated to the project's success.

The Solution must be in production and fully deployed no later than six months from the signature date of the project.

3. GENERAL PROJECT SCOPE

A. The County sees each of the following areas as deliverables under the Contract resulting from this RFP. Offerors' proposals must address each of these areas:

- 1) Provision of a COTS software suite of applications and related hardware and equipment proposed solution that would meet DLC functional and technical requirements detailed in the attached matrices of requirements (Attachments I & J).
- 2) Planning for implementation of the proposed software solution and related hardware required by the County.
- 3) Installation, configuration and customization of the proposed solution and related equipment, which includes technical consultation during the implementation, acceptance testing (refer to Section I.7) and roll-out phases to include but not be limited to: hardware/network requirements, database design, system configuration, data conversion, data population, security and data interfaces between in-house and third party systems as defined in other areas of this RFP.
- 4) Maintenance and support to include complete on-site technical consultation and support during the installation period and training of DLC technical staff to be able to provide in-house support after final acceptance.
- 5) Contractor must have a web on-line knowledge base for technical support staff for self-help.
- 6) Provision of full support for a period of three years for hardware and three years for software support from completed acceptance testing and certification. Additional years of support in accordance with Section I.8
- 7) Training to include the development of a training schedule, plans and materials and execution of training plan as proposed in Attachment M.
- 8) Documentation of the proposed solution as defined in the documentation portion of this section.
- 9) If the software does not meet a functional or technical requirement as described in Attachments I and J, the Offeror may propose an alternative solution. The Offeror must demonstrate and describe in detail how the solution is a viable alternative to that requirement.

- 10) Contractor will be required to install all software relating to the Solution to include but not limited to: Operating Systems, Solution Application, Database, Middleware (if applicable). County may elect to have County personnel to participate in this task to ensure knowledge transfer.
- 11) Contractor will be responsible for configuring the back-end application servers which include the Production, Test, Training, and Disaster recovery environments. County may elect to have County personnel to participate in this task to ensure knowledge transfer.
- 12) Contractor will be responsible for documenting and testing fail-over and fail-back to and from the Production and Disaster Recovery environment of the back-end application server. County may elect to have County personnel to participate in this task to ensure knowledge transfer.

4. PRELIMINARY PROJECT PLAN

The preliminary project plan must be in *Microsoft Project* and be based on the tasks and their respective deliverables for all phases of the project. The preliminary project plan must be presented in sufficient detail to demonstrate a thorough understanding of project responsibilities and dependencies and the level of effort required to complete the project. The preliminary project plan must include schedule, proposed milestone deliverables, completion dates for milestone deliverables and staff loading charts. Offeror may elaborate on each task or deliverable as deemed necessary to properly explain how the work will be conducted.

5. PROJECT PLAN

- A. Within thirty (15) business days after the contract execution, the Contractor must develop and submit to the County for approval, a comprehensive and detailed Project Plan that describes in detail all tasks, timing, activities and specific resources associated with the development, installation, configuration, requirements review, testing, training, and implementation of the Solution. The Contractor must seek the County's input in developing the Project Plan and the Project Plan will not be deemed final until the County has accepted it in writing.
- B. The Contractor will use the Preliminary Project Plan as the basis for the Project Plan and work with the appropriate County staff to refine the Preliminary Project Plan.
- C. Once the Project Plan is approved by the County, the Project Plan will be baselined and serve as the approved Plan and schedule for the project. Changes to this Plan will only be allowed upon a written request from the Contractor to the County's Project Manager (citing Plan change request, impacts to schedule, milestones, etc.) and the receipt of written acceptance by County.
- D. The Contractor will identify specific customization required, interfacing layouts and data conversion requirements. The Contractor must also provide details of any specific hardware and software requirements that are outside of the Department current technical profile, as well as the work space, remote access capabilities and other items needed to implement the solution.
- E. The detailed Project Plan must include at a minimum the following items:
 - 1) Identification of tasks and activities
 - 2) Identification of deliverables
 - 3) Detailed Gantt charts identifying dependencies
 - 4) Summary level Gantt chart for high level project management
 - 5) Task assignments and resources
 - 6) Milestones as they relate to payment terms in Section I.15.A
- F. Also as part of the Project Plan, the Contractor must identify and request from the County: (i) all information reasonably required by the Contractor to effectively implement the solution; (ii) the County's personnel whose presence or assistance reasonably may be required by the Contractor to perform each task required for the implementation effort and; (iii) any other equipment, facility or resource reasonably required by Contractor for the development effort. The Contractor will not be relieved of any failure to perform under the Contract documents by virtue of the County's failure to provide any information, personnel, equipment, facilities or resources: (i) that the Contractor failed to identify and request in writing from the County pursuant to this Section; or (ii) which the County is not required to provide pursuant to this Contract.

- G. The Project Plan will be maintained by the Contractor and will be updated and submitted to the County on a weekly basis throughout the implementation period, to reflect the current status of all work as of the date the plan is updated. Aside from updates to show tasks accomplished, no changes to the Project Plan will be made without prior written approval of the County.
- H. The County will have the right to audit, on its own behalf or through agents, the Project Plan and the progress of all work throughout the implementation of the Solution. The County and/or its agents will be entitled to conduct such audits on a regular weekly basis and on a random periodic basis as the County elects.

6. PROJECT MANAGEMENT METHODOLOGY

- A. The Offeror is required to submit detailed information describing their proposed project management methodology and standards (Project Management Institute standards are currently used in the County). The information must include:
 - 1) Description of methodology used
 - 2) Length of time that the methodology has been used within the firm
 - 3) Escalation procedures to be followed by the Contractor to resolve project problems, risks, issues and/or changes during the project
 - 4) Approaches to risk management
 - 5) Methodology for assessment of resource levels and task assignments
 - 6) Project change request forms and process to be used to ensure that any changes to design, in the form of clarification or change in scope are documented and tracked through the decision-making process
 - 7) A process for completing weekly status reports that includes, but is not limited to:
 - a. An updated Project Plan that indicates the progress of each task, including accomplishments with regard to objectives and schedules and activities which should have been accomplished but were not
 - b. Planned activities for the next reporting period
 - c. Problems/risks encountered and their impact on other activities and completion dates and recommended resolutions

7. CONTRACTOR'S PROJECT MANAGER'S ROLE AND RESPONSIBILITIES

- A. The Contractor's Project Manager will be the single point of contact with the County on behalf of the Contractor.
- B. Contractor's Project Manager must work onsite at the Department for at least 75% of the project or as specified by the Department.
- C. The Contractor's Project Manager's duties include, but are not limited to:
 - 1) Coordination of project schedules and resources
 - 2) Management of the overall project including preparing weekly status reports
 - 3) Provision of consultation and advice to the County on matters related to project implementation strategies, key decisions and approaches
 - 4) Acting as the Contractor's point of contact for all aspects of contract administration, including invoicing for services and status reporting
 - 5) Facilitation of meetings between the County and the Contractor's executives when requested by the County
 - 6) Promptly responding to the County's Project Manager
 - 7) Identifying and providing the County with timely written notice (within 24 hours after the company has become aware) of all issues that may threaten the Project progress in the manner contemplated by the Contract
 - 8) Ensuring that adequate quality assurance procedures are in place throughout the project, including but not limited to change and risk management

8. COUNTY'S PROJECT MANAGER'S ROLE AND RESPONSIBILITY

The County's Contract Administrator will also assume the role of the County Project Manager. For a more detailed description of the County Project Manager's role and responsibilities, see Section H – Contract Administrator.

9. MAINTENANCE AND SUPPORT

- A. The County reserves the right after the expiration of the three-year warranty period to commence annual hardware and or software maintenance and support through the life of the Contract at the established Contract prices
- B. Ongoing support is defined as, but not limited to, database administration and management, application support and maintenance, hardware support and maintenance, ongoing modifications and customizations if needed (Task Order based if the modification is outside the requirements of the contract), testing, installation and support of all systems, patches, upgrades and fixes to include applications, hardware, equipment and to include any customized or modified code to meet operational needs and disaster recovery
- C. Contractor is required to submit documentation that demonstrates all required maintenance and support tasks associated with the application(s), systems and equipment installed as deliverables in this RFP for the three-year period and subsequent one-year renewal periods following the successful implementation of the proposed Solution
- D. Contractor is required to provide at a minimum level of service for Hardware Maintenance, Software Maintenance and Support Services, as outlined below:
 - 1. Hardware Maintenance
Must be available for on-site maintenance, next business day during core business hours, 8 AM - 5 PM EST, Monday to Friday.
 - 2. Software Maintenance
Must provide upgrades, patches and hotfixes during the software maintenance period at additional cost to the County.
Must review current version on a quarterly basis for update packages.
 - 3. Support Services
Support must be available during core business hours, 8 AM - 5 PM EST, Monday - Friday.

10. TRAINING

- A. Offeror must provide sample training agendas and materials for each type of training proposed in response to this RFP
- B. The proposed schedule for training must be included as part of the Offeror's implementation plan
- C. The County will provide the training site(s)
- D. See Attachment M for proposed training criteria

11. DOCUMENTATION

- A. The Solution must be fully documented in English and accurately reflect the version of the solution for which it was provided
- B. The Offeror must detail how documentation including help screen documentation is updated
- C. The Offeror must provide electronic copies of technical and user manuals provided with the Solution
- D. Project Plan: The Contractor will be responsible for creating and maintaining a comprehensive and detailed Project Plan

- E. Project Management Methodology or System Development Life Cycle (SDLC): The Contractor will be responsible for utilizing a formal project management methodology or detailed SDLC
- F. Project Communication Plan: The Contractor will be responsible for providing a communication plan which provides for weekly status reports to the County's Project Manager
- G. Conversion Plan: The Contractor will be responsible for providing a detailed conversion plan including mapping of all existing data attributes from the current system to the logical data model of the Solution
- H. Data Population Plan: The Contractor will be responsible for providing a detailed population plan for populating the Solution
- I. Interface Plan: The Contractor is responsible for providing a detailed interface plan for the required system interfaces
- J. Design Specifications: The Contractor is responsible for creating and maintaining the Solution design as detailed in the technical requirements section of this RFP (Attachment J).
- K. Technical Architecture Specifications Manual: The Contractor is responsible for providing a manual that defines the system architecture as implemented for the County
- L. Training Plan: The Contractor is responsible for providing a plan to train all functional and technical users as proposed in Attachment M
- M. Maintenance and Support Plan: The Contractor will be responsible for supplying a detailed maintenance and support plan
- N. Configuration Management Plan: The Contractor must establish and maintain an internal Configuration Management Plan to ensure control of the product baseline documentation and/or the product media, change data, inspection and test data, etc., and to provide a chronological history for each delivered configuration item
- O. Test Plans, Cases and Results: Test Plans and cases (unit, system, acceptance, performance, stress and integration) must clearly specify and describe all tests, test methods and inspections necessary to clearly and conclusively demonstrate to the County's reasonable satisfaction whether or not the complete system and/or each functional component thereof meets and satisfies all descriptions, requirements, specifications and performance standards set forth or referenced in the Contract. Test Plans will be identified as milestones in the Project Plan. At a minimum the following components of the Solution will be tested but not limited to:
 - 1) Business functions as outlined in the functional requirement matrix (Attachment I)
 - 2) Backend application disaster recovery fail-over and fail-back
 - 3) All hardware required to support the Solution and server environment

12. METHOD OF ORDERING

- A. Customizations and modifications that exceed those that are required in the Contract will be issued as task orders under the resulting Contract. These customizations and modifications must be within the general scope of the Contract and related to the Solution.
- B. Support deemed outside the scope of maintenance and support as agreed to by the Contractor and the County will require a Task Order issued under the resulting Contract.
- C. Task Orders (individual Purchase Orders per task, or Blanket Purchase Orders) will be issued by the County to the Contractor to accomplish work after the completion and acceptance of the implementation and installation for all applications, systems and equipment delivered as part of the Contract. If blanket purchase order(s) is/are issued, written individual releases against such blanket order(s) will be made by the Department as required. Task Orders issued by the County may be either fixed-price or on a Time and

ATTACHMENT I

FUNCTIONAL REQUIREMENTS

Acceptable Responses are Y (Yes) or N (No).

If additional space is required for the comment section please attach a separate sheet and reference the requirement ID number.

ID	A. License Application Process Tracking	Response (Y/N)	Comments
FA1	The solution must track all new and transfer applications for process as seen in exhibit A7, and assign a case number.		
FA2	The solution should allow licensees to review where they are in the application process via web portal.		
FA3	The solution should have the ability to assign the case to a case manager within the Department of Liquor Control		

ID	B. License Renewals	Response (Y/N)	Comments
FB1	The solution should track the license renewal process as seen in Exhibit A8		
FB2	The Solution must provide for all fields shown in the applications in Exhibit B2 (Applications)		

ID	C. License Creation and Use	Response (Y/N)	Comments
FC1	The Solution must capture keyed-in license application data and associate it with a unique license number. License number must be editable.		
FC2	The Solution must provide for all fields shown in the applications in Exhibit B1 / B2 (Applications)		
FC3	The Solution must associate all license numbers with a partner name, corporation name, street address, mailing address, establishment name, known name, phone number or other pertinent data. This association must be relational within any search tool so users can find all licenses associated with one piece of data e.g. all licenses under "William Smith"; or to enable user to find a license without the license number.		
FC4	The Solution must capture multiple licensees names for one establishment and associate them both to a unique license number. Please state in the comments field how many		

	licensees' names your Solution will support. Currently we are using three.		
FC5	The Solution must allow the user to search all establishments for other occurrences of the same licensee names.		
FC6	The Solution must capture and track Special Events and One-day license and provide for all fields shown in the applications in Exhibit C1, C2, C3, C4 and C5.		
FC7	The Solution must allow the user to assign only one main license type to a license number.		
FC8	The Solution must allow the user to assign additional permits to a license number (Catering Extension, Beer and Wine Sampling Tasting, etc.) and all must print on the license.		
FC9	The Solution must allow new types of licenses to be added by in-house staff. Current licenses and relevant information are shown in Exhibit E.		
FC10	The Solution should attach all documents related to a license. All documents will be electronic files.		
FC11	The Solution should allow scanning paper documents into electronic files and attaching to a specific establishment.		
FC12	The Solution should include checkmarks to track all processes as detailed in Exhibit A1 / A2.		
FC13	The Solution must allow for in-house staff to add new documents as they become relevant		
FC14	The Solution must capture the license status and allow for new status' to be added by in-house staff as needed. Current are: <ul style="list-style-type: none"> • Active • Suspended • Reinstated (after a period of time automatically returns to Active) • Cancelled • Relinquished 		
FC15	The Solution should hold a history of any license status changes. Audit trail.		
FC16	The Solution must allow authorized users to create and print a signed alcohol license for all license types with the information provided in Exhibit I and Exhibit E.		
FC17	The Solution must allow authorized users to add special instructions/information, such as permits, etc., that are related		

	to the license before printing as provided in Exhibit D.		
FC18	The Solution must be able to print a receipt for fee and other payments. Tender types include cash, check and credit card.		
FC19	The Solution must be able to print labels for a mailing to licensees.		
FC20	The Solution must be able to generate a target mailing list by town, city, street, police district, etc.		
FC21	The Solution should be able to send email broadcast distributions to licensees		
FC22	The Solution should be able to auto-populate templates for various forms and letters using licensee specific information.		
FC23	The solution should accept eNotarized documents as defined in the Uniform Electronic Transactions Act (UETA)		

ID	D. Tobacco Compliance	Response (Y/N)	Comments
FD1	The solution must be able to track tobacco compliance checks from iFormBuilder or similar mobile solution.		
FD2	Tobacco compliance checks do not require a licensee, only that the address is recorded.		

ID	E. License Management	Response (Y/N)	Comments
FE1	The Solution must capture all required fields to generate reports as detailed in Exhibit F.		
FE2	Additional fields can be added by in-house staff as the need arises. These fields need to be searchable.		
FE3	The Solution must allow authorized users to add, change, update or delete information for correction purposes, while a read-only option is available for unauthorized users.		
FE4	The Solution must be able to manage the transfer of an existing license to a new owner while maintaining the license history		
FE5	The Solution must maintain all historical data related to a license		
FE6	The solution must allow for licensee requests as seen in Exhibit H, and track the approval / denial of the requests.		
FE7	Temporary changes or events to licenses must be able to print in the format of a permit as shown in Exhibit J.		
FE8	The solution must allow for bulk import of Licensee data from a centrally managed Oracle ERP system, in order to update basic information such as name, address, phone etc.		

ID	F. Fines, Violations and Fees Management	Response (Y/N)	Comments
FF1	The Solution must be able to track violations as detailed in Exhibit G.		
FF2	The Solution must allow for a bulk import of all inspections, violations and non-violation visits from iFormBuilder and/or similar mobile solution and historically from Trace (legacy system).		
FF3	The Solution must allow for edit of violations with detailed fines (after bulk import), mandates, etc. as seen in Exhibit A3 / A4 under entering violations.		
FF4	The Solution must allow for the entry of details related to a show cause hearing for violations as seen in Exhibit A4		
FF5	Solution must track payment of fines, fees and any payment plans.		

ID	G. Complaints against establishments	Response (Y/N)	Comments
FG1	The solution should allow for the tracking of complaints that will record the licensee and assignment of an inspector to investigate. A note field should be available for detail information.		
FG2	The results of inspections from iFormBuilder should link back to the original complaint.		

ID	H. Calendar	Response (Y/N)	Comments
FH1	One day licensees and hearings should create events in Microsoft outlook or Solution calendar.		

ID	I. Tasks and Notifications	Response (Y/N)	Comments
FI1	The Solution should provide standard correspondence templates with auto population to reduce duplication of effort. Please refer to Exhibit K.		
FI2	The Solution must provide the ability to capture, store, retrieve, process, track and report correspondence action items. The licensee may respond with details which should be tracked.		
FI3	The Solution should have the ability to send notifications to users when the status of a license changes. This could be		

	turned on or off, and should include internal non-users, Police, Fire, etc.		
FI4	The Solution should send notifications to inspectors alerting them that a pre-licensing or other inspection should be completed. For example when a complaint is assigned to an inspector, it should generate an email notification.		
FI5	The Solution should allow users to view any documents electronically. Documents may include application, floor plan, etc.		
FI6	The Solution should send alerts based on predefined user triggers and have the ability to build inspection schedules based on predefined criteria. For example, the Solution could notify inspectors if a licensee has not been inspected in the past 6 months.		
FI7	The Solution should have the ability to submit documents to an approver or to an approval chain for signature (electronic or hand).		
FI8	The Solution should allow users to provide a status update to a task that has not been completed		
FI19	The Solution should allow users to create reminders to follow up with licensees after a specific timeframe or interface with Outlook.		
FI20	Past due payments should notify specific users by email.		
FI21	The solution needs to have the ability to flag a licensee's file for: bounced checks, tax holds, unpaid fines, transfer application needed, license being held for safe keeping, fingerprints or photo needed for manager or license, need new valid phone number for license, multiple licenses, AAC needed, license revocation, renewal needed, other		

ID	J. Searches, Queries and Reports	Response (Y/N)	Comments
FJ1	The Solution must perform simple and advanced searches such as but not limited to searches on key fields like name or partial name searches, inspection searches, and wild card searches.		
FJ2	The Solution must possess comprehensive reporting capability including canned, custom and scheduled reports.		
FJ3	The Solution should have pre-built reports and queries or the		

	department should be able to build them. Please see Exhibit F for a list of reports commonly used by the County.		
FJ4	The Solution must be able to create and save user-defined and ad hoc reports and queries		

ID	K. Usability	Response (Y/N)	Comments
FK1	The Solution must be accessible by all approved staff regardless of location.		
FK2	The Solution should display all information associated with a license in one screen or window		
FK3	The Solution should display all information associated with a license in an easy to use format.		
FK4	The Solution should provide spell-check for manually entered fields		
FK5	The Solution should have a tab-based or other user-friendly interface for easy navigation		
FK6	The Solution should minimize data entry through the use of drop down lists, check boxes, or other means to easily note recurring items such as reason codes for unsatisfactory inspection, type of license, etc.		
FK7	The Solution should allow for additional fields, combo boxes or pick lists as the need arises and should be programmable by in-house staff.		
FK8	The Solution must prompt the user for specific information and completion of mandatory fields based on criteria related to a license type while allowing for controlled override capability		
FK9	The Solution must enforce the completion of mandatory workflow steps while allowing for controlled override capability		
FK10	The Solution should validate the length, range, format and type of particular types of data such as 10 digit telephone numbers		
FK11	The Solution should allow for exporting information from the Solution into Excel, Word, PDF, etc.		
FK12	The Solution must have the ability to capture supporting documentation and attach it to case folders from document repositories, local disk and/or scanning (copiers and Zyweb) as well as via templates.		
FK13	The Solution should allow access to the same record by more than one user at the same time while allowing only one to alter		

	content and others to read-only, such as record locking.		
FK14	The Solution should allow for printing multiple copies of a document at one time.		
FK15	The solution must be accessible with an approved web browser, be web-based.		
FK16	For web based license application (new, transfers and renewals), an option to generate a barcode to print on the application would be based on the application number generated.		

ID	L. Education Management	Response (Y/N)	Comments
FL1	The Solution should allow the management of education classes, courses and events.		
FL2	The Solution should allow people to register for classes online.		
FL3	The Solution should track class attendance.		
FL4	The Solution should print certificates for successful class attendance.		