

DEQ Too FAQs

How does DEQ address the full scope of services that may be provided via various test methods, including the “DEQ Too” test method?

The DEQ VIP oversees a variety of test methods applicable to Oregon mobile source testing, including vehicle testing in the Portland-metro and Medford-metro testing areas. The test methods, or test types, included in these areas include approaches such as testing at VIP Clean Air Stations. Within this testing group, the modes of testing at the Clean Air Stations include basic or tailpipe tests, traditional OBD test and tests that benefit from customer-provided information, known as “Self Service” or “Customer Assisted” tests. VIP also oversees several test types that are performed outside of Clean Air stations including on-site testing performed via VIP’s mobile testing van, DEQ Too tests delivered via public/private partnerships, and business fleet testing. Business fleet testing is performed via on-site certified fleet managers, VIP mobile tests, Clean Air Station tests and DEQ Too tests.

In determining the ways in which tests are performed, DEQ VIP balances a variety of considerations. For example, VIP considers customer preferences and the goal of providing customers with convenient and cost-effective options. VIP also considers legal and compliance factors impacting the ability to use a particular testing approach to address a particular customer testing need. Additionally, and related to these same considerations, VIP considers testing approaches currently in place, the changes that would be needed to modify current approaches, including the program and other expenses associated the changes to testing approaches.

Regardless of the test type or current state of testing approaches, VIP remains committed to continuous improvement in these areas. VIP’s continuous improvement work benefits from customer, service provider and other stakeholder input. Therefore, if you have any questions about a particular testing approach, or an idea about any potential changes, please email your questions or ideas to DEQToo@deq.state.or.us.

How does DEQ address the service provider approvals needed for DEQ Too-related advertisements?

The DEQ VIP has established processes and requirements for certain aspects of the marketing and advertisement of testing approaches, including DEQ Too tests. VIP leads several processes through which customers are made aware of the DEQ Too testing option for many vehicle types. VIP has, for example, worked with the Oregon Department of Motor Vehicles to craft customer testing notifications in a way that specifically highlights the DEQ Too test option, among other testing options. Additional activities performed by VIP and specifically related to the DEQ Too service line include the sharing of information via the DEQ website, signage and information sharing at VIP stations and, when appropriate, the development and circulation of agency press releases and social media announcements. These activities are performed within existing DEQ and VIP resources, funded by test fees. While VIP may at times be requested to fund additional external marketing or advertising, it is noteworthy that no direct authority for such additional activities exists at this time.

The DEQ Too tests are performed as part of a public-private partnership. The marketing and advertising of these tests is best achieved when private sector marketing and advertising complements the public sector activities. Consistent with this, the DEQ Too test method was launched in 2016 with a

corresponding set of requirements, detailed in the program's DEQ Too Terms and Condition. The host Terms and Conditions highlights that "DEQ has a strong interest in ensuring that the communication directed toward motorists accurately represents the DEQ Too program and conforms with DEQ trademark policies". Consistent with DEQ's interest in accurately representing the program, the section in the [Terms and Conditions](#) titled "Advertising and Explaining the Use of our Devices with DEQ Too" contains certain requirements regarding how to request DEQ's approval for advertising or similar materials. Also, if an ad remains in use for more than a three-month period, we ask for an additional forward of the ad, to help ensure the content remains current. If you have any questions or if you have an advertisement for submission, you may reach us at DEQToo@deq.state.or.us. Although DEQ has found that situations in which a service provider would elect to run the same add for more than three months are exceedingly rare, re-submission adjustments will be made where appropriate.

Why does DEQ charge a fee for DEQ Too tests, and how are updated fees communicated to DEQ Too Hosts?

The DEQ Too program, as with other similar partnerships, involves activities and associated expenses incurred by both DEQ and our private sector business partners. DEQ's activities in supporting and overseeing the program, limited examples highlighted below, give rise to program expenses. Similarly, individual testing business lines give rise to revenues associated with that work, as part of program revenues. Within the VIP, as a fee funded program, program expenses are intended to remain in relative balance to program revenues.

Both expenses and revenues may vary over time, and are impacted by factors such as inflation. Within the VIP, for example, program fees that were increased in 1997 were increased in 2020 by approximately \$4/test. With core program fees updated, the program will also periodically evaluate expenses and associated revenues within "sub-programs" or business lines within the larger program. The fees and expenses associated with the program's separate business lines are targeted for evaluation following the close of a budget cycle, as fiscal year information becomes available. Also, in certain cases, changing differentials between expenses and revenues may or may not support increases or decreases to certain business line fees. Depending upon the specific business line, the adjustment may require rulemaking and/or legislative approval.

Examples of VIP Expense-Associated Activities:

- Maintenance of technology platforms to enable DEQ to receive and process test results
- Handling of customer service inquiries
- Responding to service provider technical issues and inquiries
- Performing audits and other compliance activities
- Addressing transaction issues and processes associated with online payment methods
- Accounting, auditing and reconciling financial data
- Creating and maintaining agreements and similar materials used by service providers
- Onboarding service providers to negotiate and finalize service agreements
- Reviewing and approving remote-testing devices
- Addressing ongoing test reliability and other compliance issues
- Developing and implementing communication strategies, approving third-party advertisements referencing DEQ Too and responding to customer inquiries, among other activities