

A Report To The Governor Of Maryland  
And To  
The Maryland General Assembly

Regarding

Program to Incentivize & Enable Uninsured Vehicle  
Owners to be Insured  
(SB 856 / HB 1161, Chapter 195/196, 2018)

The Uninsured Division of The Maryland Automobile Insurance Fund

October 2021

## Table of Contents

<b>I.</b>	Background.....	3
<b>II.</b>	Legislative History .....	4
	(a) 2016 – 2017	
	(b) 2018 Legislation	
<b>III.</b>	Construction of the Program .....	6
	(a) Preparation	
	(b) Development of FineFix	
	(c) Marketing Plan	
<b>IV.</b>	Implementation.....	9
	(a) The Enrollment Period and COVID-19	
	(b) Contacts with Potential Program Participants	
<b>V.</b>	FineFix Results .....	12
	(a) Participation	
	(b) Vendor Costs	
	(c) Participant Demographics	
	(d) Insurance	
<b>VI.</b>	Recommendations .....	16

Report on the Program to Incentivize and Enable  
Uninsured Vehicle Owners to Be Insured  
(HB 1161/SB 856, Ch. 195/196, 2018)

This Report on the Program to Incentivize and Enable Uninsured Vehicle Owners to be Insured is submitted in accordance with HB 1161/SB 856, (Chapter 195/196, Acts, 2018).

Specifically, Section 4 of the Act directs:

*SECTION 4. AND BE IT FURTHER ENACTED, That the Uninsured Division of the Maryland Automobile Insurance Fund shall, within 60 days after the end of the Program period for the Program to Incentivize and Enable Uninsured Vehicle Owners to Be Insured as established under § 20-612 of the Insurance Article, as enacted by Section 1 of this Act, report to the Governor and, in accordance with § 2-1246 of the State Government Article, the General Assembly on:*

- (1) The result of the Program;*
- (2) The demographics of the Program participants, including gender, age, and zip code, and the insurance companies with whom participants obtained insurance;*
- (3) Any analysis or information relating to the implementation and effectiveness of the Program that the Uninsured Division considers appropriate; and*
- (4) Any recommendations to implement other programs aimed at reducing the number of uninsured motorists.*

## **I. Background**

The Act established the Program to Incentivize and Enable Uninsured Vehicle Owners to be Insured (Program) to reduce the number of uninsured vehicles in the State by incentivizing and enabling individuals with delinquent uninsured vehicles penalties to become:

- (1) eligible to register a vehicle in the State; and
- (2) insured after paying a reduced uninsured vehicle penalty.

By statute, insurers are required to notify the Maryland Department of Transportation Motor Vehicle Administration (MDOT MVA) of new motor vehicle policies. [TR Art. §17-104]. If a motor vehicle policy terminates or lapses, insurers must immediately notify the MDOT MVA after the termination or lapse is final. [TR Art. §17-106(b)]. After several unsuccessful attempts to verify valid motor vehicle insurance, the MDOT MVA then

notifies the vehicle owner that the vehicle registration has been suspended and that the owner is required to turn in the tags and registration to the MDOT MVA.

Nearly 10,000 Maryland registrations per month are suspended for failure to provide proof of valid insurance resulting from a lapse in insurance.

From the time a motor vehicle insurance policy terminates or lapses until proof of valid insurance is established, uninsured motorist penalty fines accumulate. The uninsured motorist penalties under TR Art. §17-106 can be substantial and increase each day:

<u>Length of Violation</u>	<u>Cumulative Penalty</u>
Day 1 through Day 30	\$ 150
At the end of 60 days	\$ 360
At the end of 90 days	\$ 570
At the end of 180 days	\$1200
At the end of one-year	\$2495
At the end of 18 months	\$3745
At the end of two years	\$5050

The Legislature recognized that thousands of Maryland residents could never pay the accumulated penalties. To remedy this problem, the Legislature provided a Program under which participants could pay 20% of their penalties. The remainder of the penalties would be waived by MDOT MVA and the vehicle registration suspension flag removed. Participants would then be in good standing with the MDOT MVA and could register and insure vehicles.

Under the Act, the Uninsured Division of the Maryland Automobile Insurance Fund would be responsible for administering the Program. The Program has now ended, and the Report follows.

## **II. Legislative History**

### **(a) 2016-2017**

In 2016, the General Assembly enacted the first Debt Reduction Program, providing for the waiver of delinquent uninsured motorist penalties. This bill was entitled the “Program to Incentivize and Enable Vehicle Owners to be Insured” (SB 888/HB 912, Ch. 446/447, 2016). The 2016 bill required MDOT MVA to administer the Program and provided that the MDOT MVA would waive 80% of the outstanding uninsured motorist penalties if the vehicle owner paid 20% of the outstanding balance in one or more installments. The participant was also required, within 60 days of enrolling in the Program, to register a

vehicle and purchase insurance. This insurance had to be maintained for at least six months or one year if the amount waived exceeded \$3,000.

MDOT MVA identified 192,115 debts that were subject to the bill and sent letters to each individual. Of these, 6,451 individuals enrolled in the Program, and ultimately paid \$3,878,701 towards their delinquent debts. MDOT MVA reported that 2,909 of the enrollees did not fulfill the vehicle registration request and therefore were in default. The consequence was that for those individuals, the full debts, less any amount paid under the Program and the vehicle registration suspension, were reinstated. At the time of the 2017 report, the default rate due to the vehicle registration requirement was 45% of those who entered the Program and made payments.

MDOT MVA reported that the Program was successful in that several thousand Maryland residents were given “the opportunity to no longer be burdened by an insurance compliance debt with the state.” Because the participation rate was relatively low and the default rate was relatively high, MDOT MVA advised the General Assembly:

*Recommendations:*

*Some of the program limitations contained in the statute narrowed the potential pool of participants in the debt reduction program. The most significant factors limiting participation were the age of the debt, which required that the debt be entirely accrued before January 1, 2014, and the requirement that an individual have a vehicle registered in their name (and insured) within 60 days of enrollment.*

*If the legislature would like more people to participate in a debt reduction program to allow removal of vehicle registration flags, expanding the pool of applicants to include customers with more recently accrued debts or adjusting the requirement to have a current vehicle registered would be the most direct way to increase participation.*

**(b) 2018 Legislation**

In 2018, the General Assembly revisited the Debt Reduction Program, embraced MDOT MVA’s recommendations and adopted SB 856/HB 1161, Ch.195/196 (2018). The central features of this Act are:

- (1) The Program would be administered by the Uninsured Division of Maryland Auto;
- (2) Eligibility was limited to residents of the State;
- (3) The Program period, during which time individuals could enroll, was to be between July 1, 2018 and December 31, 2019;

- (4) Eligible individuals who had delinquent uninsured vehicle penalties on or before December 31, 2016;
- (5) The Uninsured Division was required to notify all individuals “who may be eligible to participate in the Program at their last known address.”
- (6) The notification was required to include the total delinquent uninsured motorist penalties owed and the amount that may be waived. The notification also required information about sources of motor vehicle insurance.
- (7) Individuals who enrolled and paid 20% of the delinquent debt would have the remaining 80% waived by MDOT MVA. The 20% could be paid in full or paid in installments within 6 months after enrolling in the program. The vehicle registration flag would be lifted as soon as the individual paid in full or began installment payments.
- (8) Unlike the prior program, individuals were not required to register a vehicle. However, if a participant did own and register a vehicle, the participant was required to purchase and maintain insurance for at least six months or at least one year if the waived amount exceeded \$3,000.
- (9) If the participant defaulted on the installment payment plan or the insurance requirement, the full debt could be reinstated and the vehicle suspension registration flag would be reinstated.

### **III. Construction of the Program**

#### **(a) Preparation**

Prior to the implementation of the Program, the Uninsured Division of Maryland Auto met with various officials and employees of MDOT MVA and the Central Collections Unit (CCU) to discuss implementation. Both agencies were critical to the success of the Program and were excellent partners in making the Program a success. Many technical issues that inevitably arose in a project this size, with over 300,000 possible participants, were jointly resolved. Data transfers, financial transfers, account reconciliations and numerous other issues were dealt with in a cooperative and professional manner.

#### **(b) Development of FineFix**

In order to ensure that eligible debtors were able to take advantage of this program, Maryland Auto developed an entirely new e-commerce process. This included development of a website that fully explained the Program, enabled debtors to enroll in a payment plan, make payments and track their specific outstanding balance. It also

required systems that accommodated several user-friendly payment methods, including credit card payment (both on-line and telephonic), Western Union payments, and in-person payments at local CCU offices.

This effort required significant technical coordination between Maryland Auto and MDOT MVA, CCU, and Western Union to ensure that Program enrollment and payments were recorded and participant's status updated across several different databases. Processes to automatically share enrollment and payment information and to facilitate the timely lifting of vehicle registration flags were developed and put in place.

Maryland Auto's IT Department obtained a Maryland.gov domain - FineFix.Maryland.gov. - which enhanced the Program's credibility. The development of the FineFix website was a collaboration between Maryland Auto, MindGrub Technologies (website design), and Planit (branding and web content). To accommodate the needs of the Program, the site would need to provide a way for debtors to verify Program eligibility, pay in full or enroll in a payment plan, set up recurring payments, locate Program partner resources, and ultimately purchase an insurance policy.

The entire website was translated into Spanish by the bilingual members of Maryland Auto's Communications Team.

In addition, Maryland Auto wanted to remain in contact with enrollees to encourage follow-through and developed an automatic email for 12 different "trigger actions," such as upcoming payment date, missed payments, and payment plan deadline approaching. Additionally, an email was added in April 2020 when the Program was paused due to the pandemic. In total, 71,692 emails were delivered via the system during the Program with a 58% open rate and a 15% click through rate.

To handle the expected volume of calls from Maryland residents (ultimately almost 80,000), Maryland Auto engaged an external call center to provide 24/7 bilingual support to consumers and developed scripts for their representatives. These call center representatives had administrative access to the website to access account information and process payments for callers. A live chat feature hosted on the website's Contact Us page also provided 24/7 support to site visitors. On December 1, 2020, the Uninsured Division of Maryland Auto took over the call center and handled all incoming calls from FineFix participants. Also, the Uninsured Division sent 14,951 emails to assist FineFix participants with completing the Program.

After the enrollment period came to an end on December 31st, 2019 at 11:59 pm, website functionality was updated to reflect that the enrollment period had closed. Enrolled participants could continue to log into their FineFix accounts and make payments, but no new enrollments were accepted.

At 11:59 on August 3rd, 2021, the FineFix website moved to the final sunset mode and participants could no longer access their accounts. Visitors to the FineFix landing page

are now informed that the Program has ended and directed to CCU for additional information.

### **(c) Marketing Plan**

Once “FineFix” was selected as the brand platform, a full suite of creative assets was developed, including logo, website content, radio spots, out-of-home/transit ads, digital display ads, social media assets, print ads, and an animated video including:

- Print ads in 17 publications across the State, including the Baltimore Sun, Capital Gazette, Washington Post, Enquirer Gazette, El Tempo, and Mundo Latino.
- 30 second radio spots, similar in tone to PSAs, focused on introducing and creating a sense of urgency for the Program.
- On-air endorsements of the Program station personalities on WERQ, WWIN, WMMJ, WKYS, WPGC and El Zol (Spanish radio).
- Paid social media (Facebook and Instagram), paid search, and digital display campaigns for FineFix.
- FineFix advertisements were placed on bus shelters and bus kings in locations that aligned with priority counties for our FineFix audience. Flight dates were from September 16 – December 9, 2019 and included 25 bus stand locations in Baltimore City, Baltimore County, Montgomery County, and Prince George’s County, and bus kings in Somerset, Wicomico, and Worcester Counties on the Eastern Shore.
- FineFix posts ran on Facebook, Twitter, and Instagram throughout the duration of the Program. Artwork and text informing people of the Program and creating a sense of urgency with more frequency as the program came close to an end, with an emphasis on enrollment.
- Spanish language advertorials that ran in September and December in El Tiempo Latino and Mundo Latino, circulated to over 110,000 Spanish-speaking readers.
- More than 20 influential organizations, community groups and legislators agreed to promote FineFix and lend their trusted voice to help spread awareness by distributing print materials, social media content, or both.
- Facebook Live broadcast on Mr. Palomino’s Somos Baltimore Latino page, allowing Maryland Auto to present Spanish language content on the platform of a trusted community advisor. The broadcast generated 2,400 views.

- Digital media kits were provided to strategic partners, including legislators, local government, and community service groups. The kit included sample web content, constituent letters, and social media assets, including our social media content calendar, pre-written posts, and images. These legislators and groups shared FineFix information cards and posters with their constituents and distributed our content through their various print bulletins' social media accounts.
- County governments endorsed FineFix and shared information from their official social media pages.
- FineFix Program partner posters and window clings in both English and Spanish were made available to producers, Tag & Title, and other Program partner organizations.
- A free Wi-Fi was sponsored in all MDOT MVA locations. English and Spanish video played on digital screens at six MDOT MVA locations (Glen Burnie, Largo, Baltimore City, Gaithersburg, Beltsville, and Essex). These locations were chosen based on the distribution of addresses for eligible residents. This video drove Wi-Fi users to a FineFix-dedicated landing page on Maryland Auto's site ([www.mymarylandauto.com/site/free-MDOT\\_MVA\\_-wifi-sponsored-by-finefix/](http://www.mymarylandauto.com/site/free-MDOT_MVA_-wifi-sponsored-by-finefix/)). Between September and December, this page generated 36,716 unique views. The FineFix website recorded 3,095 referrals from MyMarylandAuto.com during this period.
- Various press releases were sent beginning on September 3, 2019 unveiling FineFix and announcing the partnership between the Uninsured Division of Maryland Auto Insurance and the MDOT MVA. Press pickups for these releases included Insurance Journal, TheBayNet.com, Southern Maryland News, WBOC (Delmarva), Washington Post, Maryland Matters, and the Baltimore Sun.
- Participated and distributed FineFix Program materials at the El Festival Latino (Timonium), Frederick In the Streets (Frederick), the Annual Salvadorian Festival (Montgomery County), and the Annual Hispanic Festival (Hyattsville), Locust Point Festival (Locust Point), and the Baltimore County African American Cultural Festival (Towson).

## **IV. Implementation**

### **(a) The Enrollment Period and COVID-19**

Under the statute, the enrollment period for the Program was 180 days, beginning no earlier than July 1, 2018 and ending no later than December 31, 2019. [Insurance Article §20-612(C)]. Following enrollment, participants had six months to complete their

payments, meaning that the entire Program was to conclude on June 30, 2020. After constructing the Program as discussed above, Maryland Auto opened the Program with an enrollment period between July 1, 2019 and December 31, 2019. The plan was to continue to accept payments until June 30, 2020, at which point the program would end.

On March 5, 2020, Governor Hogan declared a State of Emergency due to COVID-19 and on March 12<sup>th</sup>, the Governor issued an Executive Order authorizing the suspension of “any legal. . .deadline, due date . . .period of time or other time of an act . . .described in any . . .statute, rule or regulation....”. Pursuant to this Executive Order, Maryland Auto advised the Governor that:

*“[T]he Maryland Automobile Insurance Fund is suspending the six-month time limit to complete a payment plan under the Program to Incentivize and Enable Vehicle Owners to Be Insured. This one-time only program was established under Insurance Article §20-612 and is being administered by the Uninsured Division under the name FineFix.*

*The Program allows Maryland residents to clear delinquent uninsured motorist penalty fines by paying 20% of the debt. The statute allows payment plans but requires that the payments be complete “within 6 months after entry in the program” Article §20-612(F)(2)(iii). The goal of the Program is to increase the number of insured drivers in the State.*

*The Program has been underway since July 2019 and is to be concluded on June 30, 2020. More than 23,000 Maryland residents have enrolled in the Program. Of these approximately 7,500 have pending payment plans under the Program. Given the severe economic crisis facing the State and Nation, Maryland Auto is concerned that some of these individuals will not be able to complete their payment plan within the six-month period. The failure to meet the six-month time limit would result in the reinstatement of the entire debt and defeat the legislative purpose of allowing these individuals to satisfy their obligation to become an insured and registered driver.”*

This suspension was lifted on April 15, 2021 after the Governor, by Executive Order, ended the moratorium on statutory time frames and legal deadlines. FineFix participants were advised that all payments were due on or before July 31, 2021, at which time the program would be finally ended.

### **(b) Contacts with Potential Program Participants**

CCU provided Maryland Auto with access to the address list of over 300,000 potentially eligible debtors. Although a high percentage of those mailing addresses had already been marked “invalid” by the postal service, the list contained the last known address.

The initial campaign consisted of a series of personalized letters, in English and Spanish, introducing the Program and detailing the amount the recipient could save by enrolling.

The letter and branded envelope templates were developed as part of the FineFix creative suite. Maryland Auto and MDOT MVA logos were incorporated to lend credibility to the FineFix messaging.

During the FineFix Program enrollment period from July – December 2019, Maryland Auto distributed 668,000 pieces of mail, with multiple targeted messaging groups. These letters contained the specific amount of the debt, the amount necessary to resolve the debt and the amount that would be waived if the participant paid the required 20%.

In November 2019, CCU’s Tax Return Intercept Program (TRIP) notices were sent to over 140,000 FineFix-eligible debtors. CCU agreed to include a Maryland Auto designed FineFix insert informing recipients that the Program could help them avoid having their tax refund intercepted.

Also, in December 2019, Maryland Auto sent follow-up letters to thousands of individuals who defaulted in the 2016 Program and to the remaining 198,330 who had not enrolled by that point.

In summary:

<b>Dates</b>	<b>Recipients</b>	<b>Number</b>
July-August, 2019	Initial mailing to a portion of the eligible population	50,000
August 30- September 16, 2019	Mailing to the rest of the eligible population	278,000
November, 2019	Insert added to CCU’s TRIP notices	140,000
November 11-18, 2019	Notice to individuals who began but did not complete enrollment	2,175
December 2-9, 2019	Reminder notice to individuals who did not respond to the initial notice	198,330
December 2-9, 2019	Special notice to individuals that had defaulted in the 2016 Program	1,700
December 2-9, 2019	Special notice to “secondary debtors”	5,600
August 20, 2021	Notice to participants whose time limit had been paused and whose balance was \$50 or less	260

April, 2021	Final notice to active payment plan participants that the Program was ending	2,797
-------------	--	-------

Total: 668,000

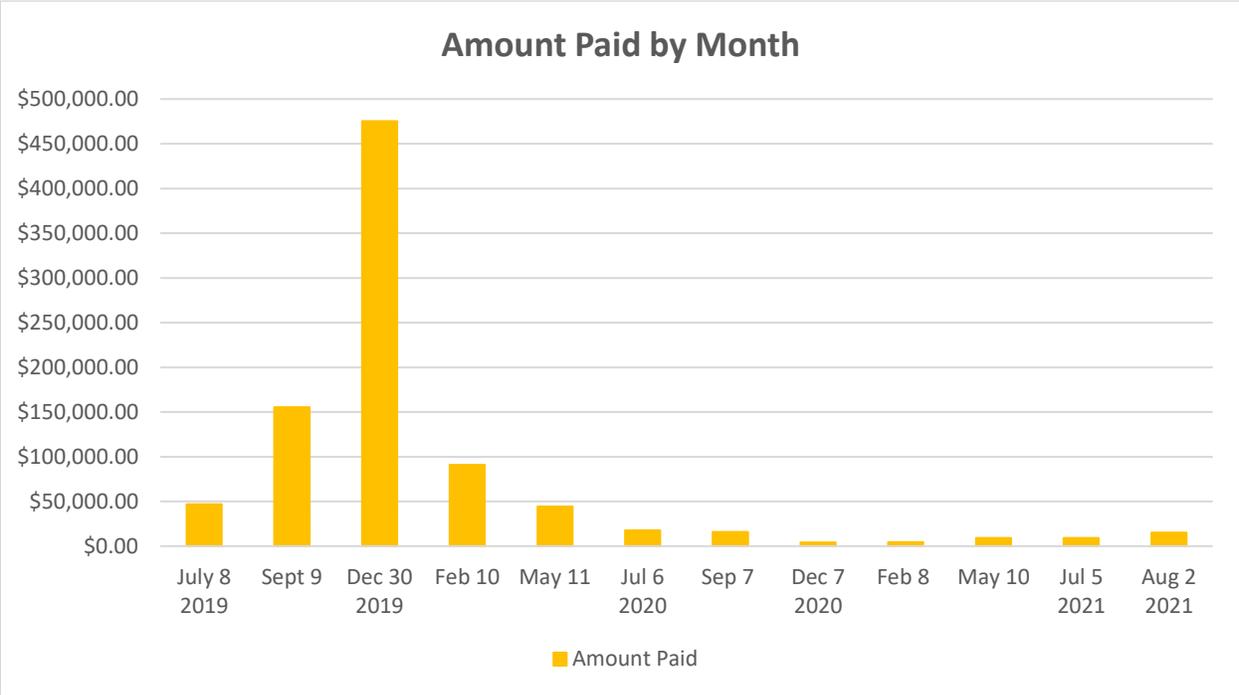
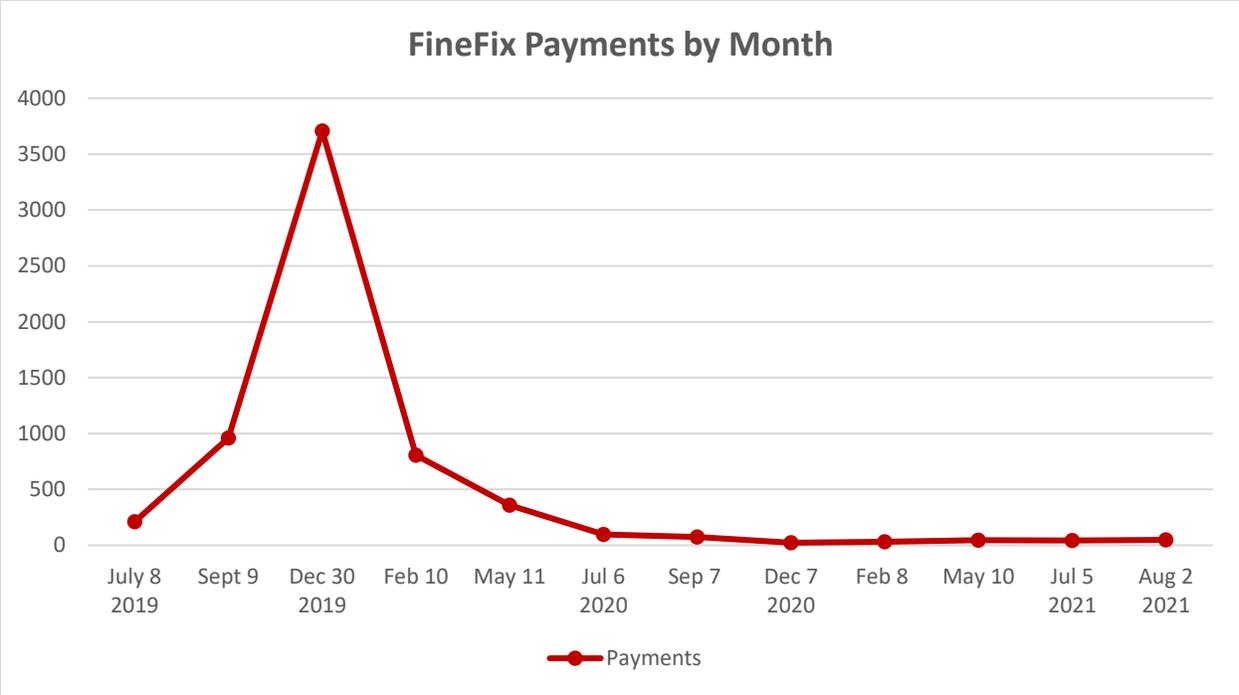
## V. FineFix Results

### (a) Participation

Once contact with eligible debtors began, participants enrolled, paid their debts in full or created a payment plan. Over time, follow-up letters and emails were sent to encourage enrollment and completion of the Program. Tens of thousands of calls to the Call Center ensued. Over time, 23,287 Maryland residents participated. Nearly 20,000 paid in full and had their debt resolved. These individuals became in good standing with the MDOT MVA and enabled them to register a vehicle.

Letters Sent	668,000
Emails Sent (system & Uninsured Division)	86,913
Individual Page Views of FineFix Website	1,206,965
Call Center Calls	78,564
Enrollments in the Program	23,449
Participants that Paid in Full	19,906
Number who Defaulted on Payment Plan	3,543
Amount Paid	\$8,151,199
Amount Forgiven	\$29,259,142

As expected, the bulk of the payments were made early in the Program, but individuals did continue to pay throughout the pandemic.



**(b) Vendor Costs**

In order to ensure that Maryland residents could successfully become aware of, enroll in, and complete the Program, Maryland Auto was required to rely on vendors for creating the website and payment systems; for developing the FineFix brand and materials; for conducting the extensive mailing services; and for providing a trained call center to handle the nearly 80,000 calls about the Program. The principal costs were:

<b>Role</b>	<b>Vendor</b>	<b>Cost</b>
Brand Development and creation of materials	Planit	\$103,600
Website Development, maintenance and hosting	Mindgrub	\$633,917
Call Center	Frontline	\$304,197
Mailing	CCG	\$220,759
Media, including print, radio, transit and social media	Varied	\$257,266

**(c) Participant Demographics**

Under the Act, the report was to include demographic results including: age, gender, and zip code information on participants. There were participants from 445 of the 476 zip codes in the State. Of these, there were 28 zip codes in which the participants were one percent or more of the total and 38 zip codes in which the participants were half a percent or more of the total.

<b>Gender</b>	<b>Percentage</b>
Male	41.97%
Female	58.02%
Unspecified or Other	0.01%

<b>Age</b>	<b>Percentage</b>
20-29	3.4%
30-39	22.0%
40-49	26.5%
50-59	25.9%
60-69	15.9%
70-79	5.1%
80+	1.2%

### Counties and Percentages

Prince George's	22.7%	Frederick	2.6%	Allegany	0.8%
Baltimore City	17.0%	Washington	2.0%	Caroline	0.7%
Baltimore	17.0%	Wicomico	1.9%	Dorchester	0.6%
Montgomery	8.7%	Cecil	1.7%	Talbot	0.5%
Anne Arundel	7.1%	Saint Mary's	1.7%	Queen Anne's	0.5%
Charles	3.4%	Carroll	1.4%	Kent	0.4%
Harford	3.3%	Calvert	1.3%	Somerset	0.4%
Howard	3.0%	Worcester	0.9%	Garrett	0.3%

### Zip Codes and Percentages

21215	2.20%	21244	1.21%	21133	0.95%	21040	0.67%	21212	0.58%
21207	1.76%	21117	1.21%	21224	0.90%	20707	0.65%	20783	0.57%
21206	1.75%	20772	1.19%	21122	0.84%	20603	0.65%	20653	0.57%
20743	1.62%	21217	1.19%	20874	0.81%	20708	0.64%	21237	0.56%
21229	1.57%	20746	1.19%	21239	0.80%	21236	0.64%	21144	0.54%
20747	1.48%	21221	1.16%	21223	0.80%	21230	0.63%	21801	0.53%
20744	1.48%	20785	1.12%	21921	0.78%	21044	0.62%	20782	0.53%
21216	1.45%	21213	1.11%	20904	0.78%	21045	0.62%	21001	0.52%
20774	1.42%	20745	1.11%	20784	0.78%	21136	0.60%	21702	0.52%
20748	1.35%	20735	1.10%	20602	0.77%	20906	0.60%	21502	0.50%
21234	1.34%	20706	1.08%	21804	0.77%	21060	0.60%	All other	37.6%
21218	1.34%	21225	1.05%	21227	0.75%	20601	0.60%		
21222	1.31%	21740	1.03%	21228	0.70%	20770	0.59%		
21061	1.29%	21220	1.01%	20721	0.67%	21208	0.59%		

#### (d) Insurance

The Act provided eligible participants a path to resolve their debt and regain good standing with the MDOT MVA. This allowed individuals to immediately insure any vehicles they currently had or insure vehicles in the future. In furtherance of this goal, the Act required Maryland Auto, as part of the notice to potentially eligible individuals, to include:

*“The website addresses of the Motor Vehicle Administration, the Fund and the Administration, where individuals may find contact information for insurers that write motor vehicle liability insurance in the State and other information about motor vehicle insurance. [Insurance Article §20-612.]”*

The Act also allowed Maryland Auto to consider applicants as eligible for a policy without additional steps, including obtaining two turn-downs.

Individuals who enrolled in the FineFix Program on the website immediately received a Maryland Auto preliminary insurance quote based on the information they entered. If the FineFix participant reviewed the quote and completed the process to purchase a policy via the website, the policy was assigned to an authorized Maryland Auto producer for follow-up and servicing. If the FineFix participant reviewed the quote, but did not complete the process to purchase a policy, their contact information was shared with a producer, via Salesforce, for follow-up. The producer was free to provide the FineFix participant with quotes from Maryland Auto and/ or any other carriers with whom the producer was appointed.

During the Program, 1,296 FineFix participants purchased a Maryland Auto policy and participants obtained insurance from many other insurers in the State.

<b>Insurer</b>	<b>%</b>
GEICO	30.70%
PROGRESSIVE	15.22%
STATE FARM FIRE	14.02%
ALLSTATE	8.12%
MARYLAND AUTOMOBILE INSURANCE FUND	4.44%
ERIE INSURANCE COMPANY	4.00%
USAA	3.39%
NATIONWIDE	3.01%
AGENCY INSURANCE	2.86%
LIBERTY MUTUAL	2.86%
AMERICAN STATES INSURANCE COMPANY	1.66%
INTEGON	1.41%
ALL OTHER COMPANIES TOTAL	8.31%

## **VII. RECOMMENDATIONS**

The Act required the Report to include “any recommendations to implement other programs aimed at reducing the number of uninsured motorists.” Based on Maryland Auto experience, we would recommend:

1. The General Assembly could consider re-enacting the same or a similar debt reduction program for uninsured motorists in the future. It seems inevitable a similar need will arise in the next several years.
2. The FineFix model could be employed in other amnesty type programs if adopted by the General Assembly. There are several programs that impose fines for noncompliance and which result in the suspension of a vehicle registration. The FineFix model could be adjusted to fit those programs if an amnesty type program was viewed as desirable.