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Bulletin

Date: June 05, 2025 with November 20, 2025 updates

Bulletin: Insurance Companies and Fleet Owners

From: Insurance Compliance Division / Vehicle Services

Subject: Application of Non-Vehicle Specific (Fleet) Policies - Best Practices & Updates

This bulletin was originally distributed on June 5, 2025. Updates to the June 5, 2025, bulletin are italicized.

The Motor Vehicle Administration (MVA) is aware that difficulties exist with the successful application of fleet policies reported as Non-Vehicle Specific. The purpose of this bulletin is to provide guidance to both the insurance carriers reporting the policies and the fleet owners insuring their vehicles to increase the likelihood of correct policy application in MVA's system.

Non-Vehicle Specific policies are difficult for MVA to properly apply to active vehicle records. Since there are no VINs included, MVA can only use the Name or ID (FEIN) to match the reported policy to vehicles. The policy will be applied to all vehicles associated with the reported name or FEIN. This can be problematic when the insurance policy and vehicle registration are not in the same name.

Fleet owners

- When titling and registering vehicles, make sure the FEIN is provided as the ID. This will allow any non-specific policies reported with that FEIN to be applied to the record.
- All vehicles covered under the policy should have the same ID or FEIN associated with the MVA record to allow the insurance to be applied. For vehicles already registered, contact MVA to have vehicles merged under the FEIN.
 - o To have records merged, MVA will require:
 - A list of the vehicles in question.
 - A list of current soundex numbers (Z #'s) or MDIDs associated with those vehicles.
 - Send this information to: <u>MDMVAVehiclesSupport@mdot.maryland.gov</u>
- Provide this list on company letterhead or send it from a company email address.

Leased Vehicles

When titling a vehicle that will be leased, include the lessee's information at the time of titling. Many vehicles are titled only to the lessor without a lessee listed. Since the

insurance will be reported with the lessee's information, they must be associated with the vehicle to allow the non-specific policy to be applied.

When titling a vehicle that will be leased, include the lessee's information and "Lessee" in the "Co-Applicant" section of the Application of Certificate of Title (VR-005). Since both the lessor and the lessee will be listed in the vehicle record, the MVA will be able to use the lessee's name to apply the policy number in the non-specific file to the vehicle record.

Insurance Carriers

- MVA recommends reporting VIN-specific policies. These policies have a far better success rate than non-vehicle specific.
 - MVA recognizes that there are reasons to use non-specific reporting. However, vehicles that are leased, or registered in a way that doesn't match the reported policy holder, make the successful application of these policies very difficult.
 - Use of VIN-specific reporting will greatly reduce the false lapse cases and FR-19 requests generated by the low success rate of non-vehicle specific reporting.
- If there are multiple unique entities that need to maintain separate MVA profiles but are covered under the same non-vehicle specific policy, the policy can be reported more than once with each company name and FEIN.
- On October 21, 2025, MVA implemented changes to the duplicate record validation. There are now two validation paths one for vehicle specific policies and one for composite or non-specific policies. For non-specific policy types, MVA will now allow the same policy to be reported multiple times with different owner IDs or FEINs. MVA will monitor this change to determine whether it increases the match rate and reduces case counts.
- Because rental trailers are required to carry insurance, insurance companies must report insurance policies for trailers with a use type of "RENTAL" (short term rentals). If policy information for other types of trailers is submitted, MVA will send a return message with an error code of 506. Effective October 7, 2025, MVA accepts insurance policy information for rental trailers. Before October 7, 2025, MVA returned an error code of 506 for all trailer policies, including policies for rental trailers.

All follow-up questions should be directed to the management of the Insurance Compliance Division to the following email addresses - Brian Forde at <u>bforde@mdot.maryland.gov</u> & Kathy Stevenson at kstevenson@mdot.maryland.gov.