

D-01-23-4

Date: January 23, 2023
Bulletin: All Dealers and Tag and Title Agencies
From: Business Licensing and Compliance
Subject: **UPDATE: Retention of Title/Registration Documentation**

This bulletin is to provide updated guidance to all dealers and tag and title entities on document retention requirements.

In accordance with Maryland Vehicle Law 15-105 licensees are required to retain **title records** (T1-T5) and Title/Registration transactions (Duplicate Titles, Registration Renewals, etc.) for a period of 3 years after the transaction to which it applies. **Records may be stored and retained electronically, but they shall be readily available for inspection and audit by authorized representatives of the State, during normal business hours without advance notification.**

The transaction types are listed below.

- New title and tags (T1)
- New title and transfer of tags (T2)
- New title and transfer with renewal of tags (T3)
- New Title and Temp tag (T-4)
- New title only (T5)
- New tag registration (NR)
- Standard renewal (SR)
- Substitute tags (ST)
- Duplicate title (DT)

Federal Law 49CFR 580.8 requires licensees to retain the odometer statement for at least 5 years. Records must be available during posted business hours for inspection by the Maryland MDOT MVA Investigators, Auditors, Business Licensing and Compliance Management, and any Law Enforcement personnel while on official duties.

In addition to this all licensees must submit the below for each transaction to the MDOT MVA. These submissions can be mailed or submitted electronically via your ERT's vendor software.

Whether title documents are mailed or uploaded the records should consist of the following documents and be arranged in the following order.

For New Title and Registration Transactions (T1 -T5):

**** From Top to Bottom ****

- Maryland MVA Title/ Registration Receipt
- Registration Card (if tag transferred)
- Application for Certificate of Title (VR-005)
- Ownership Document-Front and back
- Lien Release – Notice of Security Interest Filing (if applicable)
- Dealer Reassignment
- Bill of Sale/Gift Form
- Miscellaneous MVA Forms
- Power of Attorney (if applicable)
- Odometer Disclosure Statements (VR-197)
- Maryland Safety Inspection Certificate (if applicable)
- Customer's ID
- ID of the subject submitting the transaction if not the customer

****Please adhere to the below when sending in your records****

- Do not send in bundle reports.
- Do not send in work for another office with registration/title records.
- Do not send in checks with the ERT records.
- Each record must have a receipt attached, receipt must have the title number and vin number on it.
- All records should be secured with a staple; do use an excessive number of staples, please do not use heavy duty staples; Please ensure the proper documents are with the right record.

**** If mailing, please send to below address****

Maryland Department of Transportation Motor Vehicle Administration
6601 Ritchie Highway, NE
ERT Mail Unit, Room 202
Glen Burnie, MD 21062

For those transactions where you are unable to process via the ERT system, electronic registration and title paperwork with the implementation of eServices can be scanned and uploaded into Customer Connect using your eservice business portal. Please be advised that regardless of the method you choose for the delivery of title documentation all licensees are still required to retain title records for 3 years and retain the odometer statement for at least 5 years. **Again, these records may be retained electronically and must be readily available during normal business hours at your licensed location.**

****Please note: If submitting electronically, the original MD title, the original out of state title, the original certificate of origin, and any applicable POAs must be retained for a period of no less than 1 year.**

If you have questions or concerns, please contact MDOT MVA Business Licensing and Compliance at 410-787-2952 or mvabldisd@mva.maryland.gov