

D-06-23-02

Date: June 13, 2023
Bulletin: All Dealers and Tag and Title Agencies
From: Business Licensing and Compliance
RE: Document Retention Guidelines

The purpose of this bulletin is to provide further detail and guidance on document retention requirements.

Document Retention Requirements:

In accordance with Maryland Vehicle Law 15-105, Licensees are required to retain title records (T1-T5 and duplicate titles) and registration transactions (Registration renewals, duplicate stickers, etc.), as well as **voided transactions**, for a period of 3 years. These records must be retained in their **original** format for the first year and then may be retained in an electronic format for the remaining 2 years. They shall be readily available for inspection and audit by authorized representatives of the state during normal business hours without advance notification.

Federal Law 49CFR 580.8 requires licensees to retain the odometer statement for at least 5 years. The federal odometer statement must also be retained in its original format for the first year and then may be retained in an electronic format for the remaining 4 years.

In addition to this, dealerships and service providers must submit **ALL** documentation for each transaction to the MDOT MVA. These transactions should be submitted electronically via your ERT vendor software. In the event you are unable to submit electronically, you may continue to submit by mail until January 1, 2024. Regardless of how you submit the documents, the following are required to be a part of the transaction. See list Below:

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 (Title services only)

****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 not use an excessive number of staples, do not use heavy duty staples; Please ensure the proper documents are with the correct transaction.

****Reminder:** Dealerships must finalize all transactions and submit the necessary documents within 30 days of sale. Title Services must finalize all transactions within 10 days of acquisition and must submit the necessary documents within 5 days of finalization.

If you have any questions, please contact us at 410-787-2952 or mvabldisd@mva.maryland.gov