



# **DOJ's NMVTIS Reporting Requirements**

## *Important Issue Update*



March 18, 2009

### **NMVTIS Reporting Requirements and Initial March 31, 2009 Reporting**

The U.S. Department of Justice (“DOJ”) is continuing its work to secure arrangements necessary to allow reporting to the National Motor Vehicle Titling Information System (“NMVTIS”) by automotive recyclers. Through this involvement, the DOJ is aware of the difficulties encountered by automotive recyclers regarding both obtaining third-party data consolidators and to finalizing the technical specifications required for this reporting to occur electronically. As a result, automotive recyclers are concerned about their inability, even at this late date, to be able to provide electronic reports to NMVTIS consistent with the March 31, 2009, reporting date.

The DOJ will continue to work cooperatively with ARA and the automotive recycling industry to help us satisfy our industry’s reporting requirements under the statute. The Operator of NMVTIS, which is the American Association of Motor Vehicle Administrators (AAMVA), is required to have at least two third-party data consolidators under contract and ready to accept data from automotive recyclers by March 31, 2009, before any reporting will be required to be submitted. Additionally, DOJ has pledged to ensure at least one additional third-party data consolidator online as soon as possible. ARA will continue to push DOJ to have their NMVTIS system administrator provide opportunities for as many third-party data consolidators that is reasonably acceptable to help ensure a minimal cost compliance option. In addition, ARA continues to pursue efforts which may result in this service being made available at a very minimal cost to recyclers.

Based upon feedback received from the DOJ, it appears that, until there are two data consolidators available for collecting data for NMVTIS, the Department will probably not consider the NMVTIS program in a position to require any reporting of data by automotive recyclers into NMVTIS.

However, automotive recyclers should also understand that the DOJ cannot change the March 31, 2009 date by which reporting must commence, which is mandated by Court Order. The DOJ, however, is aware and has stated “that many automotive recyclers may need additional time after March 31, 2009 to come into full compliance with all reporting requirements.” In other words, there will be flexibility on the initial submission date for reporting, but all the information will need to be reported when procedures are in place to do so. Thus, all reports must be complete, even if they are delayed, and the initial report, when submitted, shall include all automobiles acquired since March 1, 2009.

This means that once the data reporting begins, you will have complied with the NMVTIS requirements by providing the historical information into NMVTIS when making those submissions.

### **QUESTIONS & ANSWERS:**

#### **What data needs to be provided for March 31, 2009 reporting deadline?**

Automotive recyclers are required to provide NMVTIS with the following information on each vehicle received into inventory every month:

- **VIN.**
- **Date the automobile was obtained.**
- **Name of the individual or entity from whom the automobile was obtained (for law enforcement and appropriate governmental agencies ONLY).**
- **A statement of whether the automobile was crushed or disposed of, or offered for sale or other purposes.**
- **Whether the vehicle is intended for export out of the United States.**

The National Salvage Vehicle Reporting Program (NSVRP) is a non-profit 501(c)(3) corporation that has set standards to promote compliance with the NMVTIS reporting requirements. It should be noted that some of NSVRP's data submission requirements exceed those statutorily required under the rule.

#### From what start date is the automotive recycler required to report their inventory?

Automotive recyclers will be required to report their data that has been acquired since March 1, 2009. If amenable, the DOJ would like auto recyclers to provide information for other vehicles in their current inventory.

#### If my yard management system is in the process of beta testing reporting software, do I have to temporarily sign up with another company to forward my data?

At the present time there are not two data consolidators available for reporting into NMVTIS, and the Department has indicated that AAMVA must have two consolidators under contract and ready to accept data before automotive recyclers are expected to begin reporting their data under NMVTIS.

#### Who is currently forwarding data for automotive recyclers?

At the present time there is a pilot program that has been operating since 2007 with some automotive recyclers under the NSVRP standards with NICB/ISO. In addition, Auto Data Direct has been recognized by NMVTIS as the first data consolidator with a formal contract to collect data for NMVTIS, and is now looking to sign up automotive recyclers for their program.

#### Is there going to be a charge to report?

The Auto Data Direct program has some costs associated with it. The NICB/ISO program does not have any costs for the recyclers participating under the program. However, until the ISO program is covered by a formal contract between ISO and AAMVA, AAMVA will not be in a position to accept any data from ISO under NMVTIS. It is presently anticipated that the ISO agreement will be finalized shortly, and that ISO will be the second data aggregator for NMVTIS prior to the start of the formal data collection process.

#### What are my options if I do not use an inventory management system?

NSVRP is expecting that a spreadsheet program will be made available in the near future to allow automotive recyclers that do not have computerized inventory management systems that can interface with a data aggregator. This program is expected to enable a automotive recycler with a smaller inventory to collect their vehicle data and report it to NMVTIS using the same format and the same reporting mechanism into one of the data aggregators under the NMVRP standard. The program will be provided on an 'as is' basis and will be available for download by a recycler directly to their own P.C.

#### What is the best way to find out what my information provider is doing to help me comply with the reporting requirements under this regulation?

With all the activity surrounding the reporting requirements and the abbreviated implementation time frame, it is strongly recommended that automotive recyclers contact their information providers to get the latest details on what they are doing to address this compliance matter.

#### Where can I find keep updated on the latest NMVTIS information?

To find the latest information on NMVTIS please access the Department of Justice website <http://www.nmvtis.gov/>.