

MA RMV eStamp Working Group 02/17/2022 – Questions and Answers (Q&As)

The following table lists questions received prior to, during, and after the Electronic Insurance Stamp (eStamp) Working Group hosted by the Massachusetts (MA) Registry of Motor Vehicles (RMV) on February 17, 2022. The corresponding answers are provided below.

For additional details, review the information from our [Working Group](#) sessions.

MA RMV eStamp Working Group Questions and Answers	
Question	Answer
Can you advise if the requirements listed in the draft for Insurance Stamp are for EVR dealers only or does this include non-EVR and Private Sale transactions?	It is largely focused on non-EVR and Private Sales (Casual) transactions.
In regards to private sale and non EVR transactions, can we get more clarification as to who is responsible to complete each section of the RTA Form?	The RMV has not specified who is responsible for completing the form; it could be the agent or carrier or the customer using the myRMV application that allows for the RTA Form to be completed. What we are stating is that prior to applying the Insurance Certification, that these fields need to be completed.
What fields can be left blank if it the information is unknown? IE Lienholder information or Lienholder code	We would prefer not. As stated before, the insurer needs to know who the lienholder is. The list of lienholders is on our website and is also provided via an EVR transaction. There are IPM/EVR Web Service calls that will return lienholder information. The list is available on our mass.gov website: Lienholder List .
The draft document does not advise if the form can be handwritten. We have seen some cases where a RMV location reject the forms due to some of the fields being handwritten. Can you advise?	As a practical matter, we recognize that there will always be a place for manually completed RTA Forms; the goal of this effort is to minimize them. If an insured presents a carrier or agent with a manually completed form that has of the listed fields correctly completed, they can apply the Insurance Certification. We would need to see specific examples of rejections by our Service Centers to correctly respond to this portion of the question.
Can a carrier reject a manually completed RTA Form and ask the customer to go to myRMV and complete the form?	That is up to the carrier or agent to decide, but that would be preferable from an RMV perspective.

<p>Can a carrier provide the customer with a product similar to what is available via myRMV to complete the RTA Form and/or provide the required information?</p>	<p>Yes, absolutely and we would encourage you to consider using the EVR Get Ready (formerly Pre-Stage) transaction to perform the validations.</p>
<p>Can you please point me in the right direction for the Guidelines for E-Stamps? I know it is on your website, but I am not finding it. I am looking find out what is acceptable for e-stamps made from wet stamps. Thanks so much.</p>	<p>The document is located here: Approval Process for Electronic Insurance Stamps and RMV Forms</p>
<p>Is Boston Software the only solution that will be allowed to be used or can other vendors and service providers create their own insurance stamp processing as long as it meets the RMV's requirements?</p>	<p>Yes, a carrier, agent, or approved vendor (Service Provider) could create their own process for completing the RTA Form and applying the insurance stamp as part of that process (assuming the entity completing the form was an agent). We would encourage you to use the EVR Get Ready transaction to accomplish this task.</p>
<p>I'm concerned with the non-EVR transactions/private sales. Not all agents may have access to the "get ready" or want to pay for that. They should still be able to use the wet stamp...would they be able to scan the document and email it back?</p>	<p>Yes, that is acceptable. This information is also outlined in the proposal document. However, you should keep in mind that an emailed or faxed document is not considered a secured document for the purposes of the Drivers Privacy Protection Act (DPPA).</p>
<p>If they list the lienholder but do not use the lienholder code, can it be accepted to process through EVR?</p>	<p>Yes, for EVR, the code will be provided. For non-EVR, the lienholder name is acceptable.</p>
<p>Documents have been approved for both handwritten and typed. However, their insurance certification should only be done by the agent and not the customer.</p>	<p>The RMV agrees with this statement.</p>
<p>I have had clients complete RTA forms and we have had to re-type them as they did them wrong.</p>	<p>That is exactly the point here; all three parties (RMV, agent, and carrier) need to get the information on the RTA Form entered and recorded correctly or else we open ourselves up to future problems.</p>
<p>I understand that you are not saying who is required to fill out portions of the form however if the insurance certification cannot be stamped until all this information is filled out correctly, a concern is that you have inadvertently made the entity that stamps the insurance certification responsible for the entire</p>	<p>The RMV has made the case that all of the requested information is necessary for the carrier or agent to properly rate the policy and for the RMV to correctly register the vehicle. Thus, our assumption is the carrier or agent has verified the information on the RTA Form prior to affixing the Insurance Certification.</p>

breadth of information required on the form?	
Does the RMV maintain an updated list of electronic addresses for the carriers and insurance agents?	The RMV does not have a list of the electronic addresses for all agents and carriers.
Will the Questions and Answers from today's call be updated to the presentation?	Yes, we will be collecting all of the questions from this webinar and will distribute them separately to all attendees with the corresponding answers.
We have had things bounce because a customer filled in a policy change date and it wasn't the agent's typed change date.	An agent should be the only one should be putting this date; the customer should not be providing this date. The business rule is that the RTA Form is supposed to be processed within 30 days of the policy effective or change date.
this is for the handwritten and typed ... I only wanted to say that that section K should be the filled in from agent.	Agreed.
Is the 'electronic stamp' simply a local file on the agent's computer? Can they be considered simply another signer in the digital signature process that signs with the stamp instead of a signature?	<p>There are different solutions to create an electronic Insurance Certification. Often, this certification is thought of as simply the "stamp" when there are really six items involved in the certification, they are:</p> <ol style="list-style-type: none"> 1. The Insurance Carrier name. 2. The Insurance Carrier 3-digit code. 3. The Policy Effective or Policy Change Date. 4. The date of this Certification. 5. The name and license number of the Agency/Producer processing the Certification. 6. The name of the person that is processing the Certification. <p>It is up to the entity creating the electronic certification to determine how many of these, beyond the facsimile of the stamp, they automate and the process they use to accomplish this. Note that if the RMV's Get Ready application is used to accomplish this, all of these items, with the exception of the signature, are done electronically.</p>

How do we become a test user?	Send an email to Charlie Walsh at Boston Software: charlie@bostonsoftware.com .
We would love that but there are a few companies that refuse to have an electronic stamp.	That is surprising. We would like to know which carriers so we can directly reach out to them.
SinglePoint renders the stamp at real time an requires a typed signature at time of application.	N/A
Stephanie -- when it's appropriate, can I make a couple comments regarding the status of our (Boston Software) pilot?	Charlie provided an overview of the Boston Software solution and how it works with SinglePoint.
There are some carriers that will not give agents stamps and are not electronic.	From an RMV perspective, if an agent has been given a rubber stamp by a carrier, they have been authorized to apply Insurance Certifications on that carrier's behalf. This certification can be applied by manually stamping and filling out the applicable sections of the RTA Form or by electronically affixing the certification to the RTA Form. Both result in the same basic visual representation of the Insurance Certification on the RTA Form. If the carrier insists on applying the stamp to the RTA Form, that's their call. They would be subject to the same requirements before applying their stamp to the RTA Form.
Is there an alternate / more secure method for sending a digital form other than by email?	This is somewhat dependent on the agency or carrier, but common methods are via encrypted email or by having the customer securely obtain the form from your website.
Will carriers use the form in Appendix A - Standalone Ins. Certificate to electronically sign the RMV forms?	Yes, this can be done. A sample use case would be for a dealer to do this over the phone for a customer and the form is electronically signed and then the dealer registers the vehicle.

<p>Can a MA producer create their own electronic stamp from the rubber stamp?</p>	<p>Yes, see answers above.</p>
<p>What does the SinglePoint system cost for each returned insurance stamp?</p>	<p>There is no cost for agencies to use SinglePoint Insurance Certification solution at this time; fees for dealers have not yet been determined. In addition, there will not be a fee to participate in the Pilot.</p>
<p>Will any other providers who develop their own systems have the same amount of time to develop the system that Boston Software received to plan, develop and Pilot their system?</p>	<p>We do not know the answer to this. The conundrum for the RMV is the combination of (A) is the electronic insurance stamp process viable as presented and if it is, then (B) who should be providing that "service" and (C) at what cost (if any). In order to solve this, we need to first make the determination that the current Pilot is viable. Assuming that it is viable, the RMV is committed to resolving B and C with the industries input as we view this as a shared, common problem.</p>
<p>The new proposal outlines that the Insurance Company can stamp the RMV form only if all the fields are filled out, we have concerns that there are portions of the form that we would not be able to verify the accuracy of the information provided. Whose responsibility to ensure the information on the form is correct? If the policyholder provides incorrect information is the onus on them?</p>	<p>The RMV expects that even under this proposal, there will still be errors. As a practical matter, one can only make the best effort to ensure the information as presented by the insured, is correctly recorded on the carriers records and on the RTA Form. That said, the RMV makes many Web Services available to carriers (at no cost) that would help carriers ensure that the errors are kept to a minimum.</p>
<p>Why doesn't the RMV create a robust web based process that either an agent, carrier or insured could use to complete the RTA?</p>	<p>The primary reason is as follows. If a robust Q&A style process were available via myRMV and the insured used it to complete an RTA Form, they would then presented that completed RTA Form to the agent or carrier for certification. The agent or carrier would then need to manually collect much of the same information from the insured to update their own records. To us it made sense to provide the Web Services that would allow the carrier or agent to capture and validate this information for their own records first and then produce the RTA Form as an artifact of that process. Based on the input received, the RMV will consider developing the suggested process.</p>

<p>In follow up to the RMV Insurance Certification meetings, we have some questions about the processes being discussed, especially in regards to our situation. We are an insurance company that covers Commercial Autos in MA. Dealer/Brokers send us completed RMV Registration and Title Applications that we have to print out, stamp with a physical stamp, sign, and return to them. We have RMV access to keep track of when a vehicle is registered and then we report it (submit electronic coverage). We would like to be able to do the physical signing and stamping in some sort of electronic format. I'm unclear on how we would go about accomplishing that or who we would contact? We also want to know if there is change in procedures/systems that will not allow us to do what we have been doing until now.</p>	<p>For the Registration and Title Applications (RTA Forms) sent to you from a dealer, you could use the Pilot process we are offering (see above regarding how to participate). Also, for the RTA Forms that are coming from your customer to you, there isn't a way to apply an electronic stamp, unless you recreate the RTA Form using your software or using the EVR Get Ready process (for EVR Participants). If you have further questions, please reach out to us.</p>
<p>We are concerned that it appears that this process requires the insurer collect all of the information on the form. The RMV response seems to suggest that all of the data on the form is necessary for rating purposes. However, insurance companies in MA have varied rating plans that are filed with the Division of Insurance. There are many fields on the form that are not collected or used for rating purposes. We have concerns about collecting information that is not used utilized by us and it is possible that our customers would prefer not to provide some of that information. For example, credit is prohibited to be used in MA for rating, and requesting a customer's social security number is not part of our process. We recognize that some agents and carriers assist their customers with registering their vehicles as a customer service (sometimes with an additional fee), but there is no statutory obligation for insurance companies to be responsible for registering a customer's vehicle. Requiring all insurers in MA to conduct this process would require significant system changes and hiring additional staff to handle vehicle registrations specifically.</p>	<p>The RTA Form identifies the various elements that are necessary to accomplish a Registration, Title, and insuring of the vehicle. The RMV understands that there will be circumstances where an insurer will require more or maybe less than what is on this form, but it is at the margins, e.g., both the RMV and insurer need 98% of the same information. The SSN example is an edge case where the customer does not have a driver's license or state issued ID. In this circumstance, the RMV will specify that the insurer does not need to collect the SSN. The RMV's position is that the insurance certification is only valid if the RTA Form is complete and correctly identifies the vehicle, owners, lienholders, garaging address, lessee, and registration (if applicable).</p>

<p>We are concerned that it appears that this process also requires the insurer to be responsible for the accuracy of the form. If a correction is needed on the registration, it requires the policyholder to re-register the vehicle. Our concern is that [we] will be held responsible for the fees related to registering the vehicle.</p>	<p>Below are the items we specified must be sent to the carrier. The dealer is usually the accountable party for the accuracy of the information provided below.</p> <ol style="list-style-type: none"> 1. The completed RTA Form and preferably signed by the dealer and the customer, 2. A signed Purchase and Sales (P&S) agreement, 3. Either the signed Title or MCO, 4. Optionally, for new vehicles, a copy of the window sticker or the dealer invoice, and 5. Optionally, a copy of the registrant's Driver's License.
<p>The RMV's noted that the information is available in the ATLAS system for no additional charge to the insurer. However, not all information is available in Atlas and in order for [us] to utilize this information, it would require us to manually review each RTA form with the information in the Atlas. This would be a costly and timely process that is outside the business of insurance. The volume of RTA requests (137k annually) we receive will inevitably cause long wait times for our policyholders to receive their forms and potential call backs.</p>	<p>The answer above describes the items we specified must be sent to the carrier. The dealer usually provides this information and is the accountable party for its accuracy. (EVR Participants may also have access to some of this information.) If the RMV is able to offer additional solutions in the future to assist, we will share with this group.</p>
<p>Since the EVR dealer is responsible for registering the vehicle on behalf of the policyholder. We were wondering if it necessary to have the Insurance Stamp applied on the RTA form only after everything is filled out for EVR dealers? If so, would it be possible that the insurance company could send the dealer the Stand-alone Certificate once the vehicle is added and the EVR could use it along with the RTA form to register the vehicle.</p>	<p>If you want to use the Standalone Insurance Certification in the manner described, the RMV is fine with that approach.</p>
<p>As we review the requirements for Insurance Certification, we are hoping to put a process in place that does not require a back and forth process of the RTA form between us and the insured. Would it be possible to apply the insurance stamp prior to section L (seller's info) and section M (Insured's signature) being completed? Our thought is to allow the policyholder fill in these field once they receive the stamp form from us.</p>	<p>This is acceptable and the RMV will adjust the requirements to reflect this change. Thank you for the suggestion.</p>