

Issue	State Recommendation	Insurance Industry Recommendation	Nevada's Response
Commercial businesses register under multiple names, insured under one policy.	Complete affidavit identifying all commercial fleet VINS and registered names.	Statistically, the Commercial insured is not the uninsured. 21 states of the 35 states using electronic verifications do not require commercial insureds to participate in the programs. Those states do not have a Commercial uninsured issue.	The DMV has requested statistics from the Office of Traffic Safety to help Nevada properly assess and address this issue. One claim from an uninsured commercial insured poses potential liability for the State and our citizens. To assist us in making an appropriate determination for Nevada, the DMV would be interested in any research or historical data the insurance industry can provide to support this recommendation.
Insurers often refer to these policy vehicles as fleet vehicles, they may or may not register as fleets.		Including Commercial businesses as mandatory is costing the state, the insured, and the insurance companies unnecessary costs of operation, with no real gain in reducing uninsured motorists.	While this statement may be true of large commercial businesses such as FedEx or UPS, we are unaware of any reports or historical data to support this statement. Nevada must also consider the smaller commercial businesses such as local plumbing companies, landscapers, etc. Exempting all commercial businesses from insurance verification leaves the State open to potential liability. The DMV also cannot discriminate on whether or not insurance will be validated based on company size alone. The DMV knows there are and have been lapses in coverage for commercial businesses.
Commercial Insurance Carriers do not collect vehicle information for these type of policies.		Recommend voluntary participation of Commercial Insurers.	In accordance with the Nevada LIVE Insurance Company Guidelines, the DMV sends the VIN, NAIC, policy number, dates to confirm, registered

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			owner name, and the driver's license number or FEIN, for each query. It is up to the insurance company to use any or all of these values to confirm or unconfirm coverage in accordance with the IICMVA Guidelines.
		If unable to confirm – use secondary source (i.e. Certificate of Insurance, paper ID cards, sending request to insurer provided by Insured, exemption of Commercial Businesses).	The proof of insurance card is acceptable for vehicle registrations and renewals, but coverage must be validated electronically. Insurance records should be in the insurance company's database or submitted in the weekly files.
		Eliminate post dated verification requests. Use current or recent dates only for gaps. Pick current or recent date to confirm.	Based on comments received from the insurance industry, DMV programming has been changed to go back no more than six (6) months for verification requests (postcards).
No FEIN required at registration but required to locate registration on website.	Obtain FEIN from insured.	Personal –okay as is.	
		Commercial – lift restriction on website requiring FEIN.	In order to allow agents and registered owners to update on the web, exact matches are required to access the vehicle registration record for security purposes because the DMV database is being updated. The DMV would like to explore the possibility of receiving monthly books of business to alleviate the registered owners' responsibility to report their new insurance company and policy number. Feedback from the

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			insurance industry on this would be appreciated. By not requiring the FEIN, or some other unique identifier (VIN), the system would potentially return multiple records causing security and confidentiality issues as well as potential corruption of data.
		Making FEIN an optional request versus a mandatory requirement.	FEIN is only required for non-vehicle specific policies because the VIN is not available and name is not the primary matching item. Please see concerns and possible solution above. The DMV would like to know why carriers are unable to obtain the FEIN in order to assist the registered owners.
New Omnibus Package requires FEIN and the wording Fleet upon registration.	Omnibus Package proposal requiring FEIN and Fleet.	Provide the primary named insured and fleet wording only. Make the FEIN on the ID Card as an optional element for the insurer, rather than a mandatory requirement.	Assembly Bill 74, Bill Draft Request 57-472, in section 53, only adds "fleet" when the policy is a fleet policy. Any additional comments or recommendations for this requirement should be directed to the Division of Insurance.
System locks users out once postcard expires.	None	Leave system open for updates up and until 30 days after the suspension date. (see next item).	Only the "I" access code provided on the postcard prohibits entry once the postcard expires and the certified letter is generated. Updates are still permitted by either the registered owner or their agent using the Update Insurance Information page on the DMV web site.

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Insureds switching carriers are getting suspended.	None	A grace period should be implemented for insured's who change carriers. This would allow additional time for the insured or their agent to update the insurance information on the web. New business usually takes more time to effectively complete and process unlike a renewal. The availability of a grace period would help alleviate the potential for suspension of vehicle registration for failure of the insured to provide evidence of insurance as well as for the insurer to verify insurance coverage.	<p>At the beginning of the Nevada LIVE project, the IICMVA Task Force explained the average time for an insurance record to be added to a database is 23 days.</p> <p>If an insurance policy has not been confirmed, DMV currently waits 30 days before sending the postcard requesting insurance information. The DMV believes 30-days is sufficient for the registered owner or their agent to update the insurance information. The postcard then allows an additional 15 days for the registered owner or their agent to provide the insurance information.</p>
		We would also recommend to extend the 15 days to respond to 30. With mail and delivery, 30 days is a more universally accepted practice.	Statutes outline the time frames for registered owners to respond to the DMV's request for insurance information. In lieu of submitting the postcard, the registered owner or their agent can use the "I" access code on the postcard to update the information on the web site. It is important to note the registered owner has already had 30 days without a confirmed policy prior to the 15-day request for information.
Increase in suspension as a result of new system/process.	TBD		Since the implementation of Nevada LIVE vehicle suspensions for no insurance have actually decreased. The insurance industry may perceive an increase because registered owners

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Reinstatement cannot occur until a fine is paid.			<p>In order to resolve an incident, the insurance company can send the DMV a confirmed policy for the time period in question. In these instances, the fee would not be assessed and the registration would be reinstated.</p> <p>If the policy lapsed, the registered owner is required to pay the fee in order to reinstate the registration. The fee can be paid by mail, or by using the web or a DMV self-service kiosk.</p>
		Difficulty in re-accessing insurance information via web portal to re-verify coverage exists. Information is stored with the DMV but programming constraints make access cumbersome resulting in miscommunication between DMV, Insured and Carrier.	The DMV web page provides access to current vehicle registration status using only the last 4 of the VIN and the plate number using the "Registration and Insurance Status Inquiry" link. This tool is available to both the registered owners and their insurance agents.
Fines are not being waived even though continuous coverage can be proved.		The DMV has previously advised that no fine had to be paid if continuous insurance is provided however, we are not finding that to be the case.	When proof of continuous insurance is validated, the incident is rescinded without collection of the reinstatement fee. The DMV is willing to review specific cases. Please provide appropriate details.
		Insureds need more time to correct errors.	The DMV would like to know what the insurance industry deems a reasonable

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			amount of time for insureds to correct errors.
Insurance carriers are having difficulty getting insured cleared via customer service.	State response has been to go to the website and make changes.	Carriers don't always know the FEIN (see earlier issue). Additionally, the length and limit of contacting customer service needs expansion. We recommend modification of the website to allow broader access to remedy issues.	<p>What other unique identifier does the insurance industry recommend? See other proposed solution for submitting book of business, etc. above.</p> <p>If the data is correct in the insurance company data base then the need to contact customer service would be reduced.</p>
		Propose separate customer service number for insurance carriers with staff trained to handle more complex calls.	Insurance underwriters already have a special phone line that is manned by dedicated Nevada LIVE staff. Agents should work with their corporate office to resolve errors and issues and then the authorized representatives can contact DMV. This will expedite the process and reduce the phone wait times.
Insureds are being suspended if the name is essentially correct but the corporate type abbreviations are left off. (i.e. LLC or Inc.)	State is looking for an exact match.	Recommend working with the State to find an alternative solution that better fits the Insured needs while still meeting State requirements. (The matching accuracy will greatly improve if "policyholder" (as it appears on the ID Card presented) is used rather than registered owner.)	The DMV does not use or collect "policyholder" information. In accordance with the Nevada LIVE Insurance Company Guidelines, the DMV sends the VIN, NAIC, policy number, dates to confirm, registered owner name, and the driver's license number or FEIN, for each query. It is up to the insurance company to use any or all of these values to confirm or unconfirm coverage using the IICMVA

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<p>Limit of 5 records to have fixed via a customer service call and an inability to use the website. No efficient way to verify coverage.</p>	<p>Utilize the website.</p>	<p>Because of the lengthy wait still occurring (50 to 60 minutes on average) and the inability for an insurance company to check more than 5 vehicles, we recommend adding a different access layer to the website for insurance carriers where our credentials and just the VIN are sufficient for searching. It is burdensome, not only for the insurance industry, but for the State to try and handle the volume of inquiries telephonically.</p>	<p>Guidelines.</p> <p>Insurance companies can use the DMV's Records Section for inquiries to review the status of a vehicle registration. DMV recommends agents work with their corporate office to resolve errors and issues, and then the authorized representatives can contact DMV. This will expedite the process and reduce the phone wait times. To modify the insurance information, the insurance update transaction is available on the web. When using the DMV web, exact matches are required to access the vehicle insurance record for security reasons because the DMV database is being updated.</p>
<ul style="list-style-type: none"> • Personal lines carriers experiencing issues upon renewal with high net worth clients. <ul style="list-style-type: none"> - These types of clients typically own multiple residences in multiple states. - The residence may not be the insured's "permanent" residence thus the insured's drivers license will typically be "out-of-state". - Additionally, various corporations and trusts are established to protect net 	<p>TBD</p>	<p>Propose that the State account for this type of scenario within their DMV practice</p>	<p>Vehicle registration does not require a Nevada driver's license. However, if the insurance is non-vehicle specific, the vehicle information is not available; therefore, the Nevada DLN is required.</p> <p>The DMV is unclear as to the issues with renewals and is open to suggestions.</p>

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worth. <ul style="list-style-type: none">In both cases, renewals are an issue as insured may not possess a Nevada DL.			