

QUESTIONS AND ANSWERS: Special Minor Restricted License (SMRL)

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Eligibility

QUESTION	ANSWER
Can they get a MSL after July 1st?	No, we will only issue the SMRL after July 1 st , 2024. Note that the words 'Minor School License' will still print on the back of the license with the Restriction 7 until Idemia completes the card redesign in the next few months.
They must be approved for the school portion in order to do the work portion, is that true?	Correct, a student must meet the underlying eligibility criteria for the SMRL as a student (either public, private, or homeschooled) and provide Form 430021 Affidavit for SMRL at the time of issuance in order to also utilize the SMRL for employment purposes.
Reasoning behind adding years to the length the license is issued?	This helps ensure that students who are not eligible within a 2-year issuance period will not expire. We anticipate that some students may hold the SMRL longer than 2 years with the additional consequences.

Driving Purposes

QUESTION	ANSWER
How does the distance affect open enrolled students? If they're open enrolled and it's more than 25 miles; they can't drive?	Correct, if an open enrolled student (that does not live within their school district of enrollment) does not live within 25 miles of their school, they cannot drive to school using the SMRL.
Is the rule still in effect that they can't cross school districts with open enrollment?	No, we no longer need to consider whether a school district is contiguous. A SMRL holder that does not live within their school district of enrollment can only drive up to 25 miles to school.
Is the radius for Farm Work still 50 miles?	No, the driving distance for farm work purposes has been reduced to 25 miles.

To participate in extracurricular activities-does it have to be school related still?	Correct, a SMRL holder can only drive to activities that are sponsored/organized by their school of enrollment.
What if the location for the extracurricular activity is not on campus?	The SMRL holder can drive to participate in the extracurricular activity if it is held a location other than their school so long as it is still within 25 miles of the student's residence.
After getting back to school on the bus after participating in an extracurricular activity, the student has 1 hour after they get back to the school to drive home?	That is correct. An issuance staff person with law enforcement experience has shared that law enforcement officers can determine violations on the spot, or after the fact. If they are unsure of a time violation for when a function ends, they can go back and meet with the driver and parents later. Not all violations are determined on scene.
Could a student drive from home to school to work? So they leave home in the morning, go to school and then work right after school?	If the student's employment still falls within the 25-mile distance from, the SMRL holder could drive directly from school to work.
Can a student leave school at normal hours and go home and then drive back to school if practice doesn't start until later? So, say they are done at 3:30 and practice isn't until 5. Do they have to stay at school?	Yes, a student could drive home after school and then return to school before practice begins at 5pm.
What if the student will be going to school late or getting off early. Is the time specific to when school starts and ends. Ex. They have a doctor appointment so, going to school late/early.	We will leave this up to enforcement, however it may be a good idea for the parent to send a note.
Can a SMRL holder drive to a community college to attend classes they are enrolled in?	Yes, if the SMRL holder attends classes at a local community college and is scheduled for those classes through their high school of enrollment, they can drive to the college if it is within 25 miles of their residence. In the past, under the MSL rules, we have asked the student to have the affidavit completed by the college as well if they were dual enrolled. This is not necessary if the qualifying high school or primary homeschool instructor complete the school certification portion of the form 430021 affidavit for SMRL.
Does this allow teens to drive to work in other states if the job is within 25 miles from their home?	Yes. However, the SMRL holder needs to check with enforcement in the other state to verify whether they will honor the SMRL.

Aren't there specific hours that 14-15 years can drive in Iowa? For example, I believe they can only work from 7:00 Am-9:00 PM during the week. How does this come into play in regard to the SMRL and "pulling a calf" at 2:00 AM?	The legislation does not address any child labor regulations (either federal or state). An employer is responsible for scheduling the student within the hours allowed by law. This is not our area of authority and we should direct a parent with questions to Iowa Workforce Development or Iowa Department of Labor.
So, a student with a SMRL can now drive less restricted hours than an intermediate?	It's not necessarily less restrictive, but the rules are different for each license. Iowa law does allow an Intermediate License holder to carry a waiver form completed by their parent and employer that allows them to drive unaccompanied between the hours of 12:30am and 5am. Form 431170 can be found online here: [Iowa DOT] 431170. Waiver of Intermediate Driver License Hour Restriction (seamlessdocs.com) .
The Y restriction (Intermediate) does not include work only school?	The Intermediate License is not changed at all with this new legislation. An intermediate license holder is not restricted to the same driving purposes the SMRL is.
Is the curfew the same for extracurricular activities?? I believe it was/is 10PM or 1030PM.	No, as of July 1 st , 2024, a SMRL holders will be allowed to drive in the hour before the activity starts and in the hour after the activity ends.
How will they know when an extracurricular activity ends? For example, basketball game end times vary.	This will be up to law enforcement to determine.
Maybe it would be wise to inform them to also carry their games schedule with them?	This is not necessary, but they can do so if they would like to.
Under the extracurricular activity section, are you wanting them to put each baseball game date and location etc?	It's not necessary to put each specific game or practice on the form, they can simply list "Baseball" as their extracurricular activity. However, note that we do not review the form after it's completed, it will be up to law enforcement to determine if they have enough information.
If a student goes to a football game at a bordering school just to watch, do they have to have that written down as an extracurricular activity on their forms?	A SMRL holder cannot attend activities as a spectator that are sponsored/hosted/organized by a school that is not their school of enrollment. The student must follow their school's rules for

	traveling to participate in extracurricular activities that are held in another school district within 25 miles (ie. an away game).
If a SMRL DL is working and is abusing the privileges at their job (not showing up to work & driving during designated work time), does employer have authority to request revocation?	No, we can advise the employer to contact law enforcement with these concerns. We require consent from the school and the parent before issuing the SMRL, not the employer.
If a SMRL holder mows lawns, could they go to multiple addresses to mow, would that qualify for work?	Yes, however, they need to have the address for each lawn they mow listed on form 430022. Note, however, that the SMRL holder could not pull a trailer carrying a lawn mower.
Is law enforcement getting some kind of training on their end with the new rules?	Yes, we have been communicating with our law enforcement partners and we have shared Form 430022 in advance for their input.
Can we give a printed copy of this PowerPoint to the officers?	Without the added information we provide during the presentation, the PowerPoint may be confusing. We suggest law enforcement work with their supervisors directly to determine how they will enforce the new SMRL rules. They can reach out to Kayla Burkett, our Chief Integration Officer, to organize any additional training from our staff if they think it will be helpful.
Is there a link of list of some kind that we can refer to for the amount of minor passengers??	The rule regarding the number of minor passengers has not changed. A SMRL holder can have only one unrelated minor passenger in their car. This is listed on the Form 430021 Affidavit for SMRL (as well as the previous MSL version of the form) and the rack card.
Is the SMRL parental consent required even if only using for school purposes and the student is not driving to any other activity?	Yes, form 430022 Parental Consent for SMRL is required for every SMRL holder regardless of the approved purpose. We want to keep this consistent for law enforcement, so they do not need to keep track of which students need the form for which purposes—all SMRL holders need to carry the form in the vehicle with them.
Can a SMRL holder drive to other locations if their job requires? Examples: A nanny/babysitter bringing the kids to the pool; a teen working for a mechanic that needs to test cars or deliver a	No, on the job driving is not allowed for SMRL holders driving for employment. The new legislation only allows for on the job driving for farm work within 25 miles.

car to a different place; a lawn clean-up company where the employees drive from different yards to the waste dump?	
Would they be able to drive between their 3 residences? Are there time restrictions from going from approved address to approved address?	A SMRL holder with multiple residences is not authorized to drive from residence to residence. They can drive from one residence to school/extracurricular/employment/farm work and then to a second residence.
Do they have to "live at" the address added to SMRL?	The legislation defines a residence as a place where someone lives either permanently or temporarily. It is up to a parent or guardian to determine whether the student resides at an address and provide consent on form 430022 for the SMRL holder to drive there.
What if they drive back to the school parking lot in between two residences (Mom's and Grandma's)?	This is not advisable unless they are driving to school to attend duly scheduled classes or to participate in an extracurricular activity.

Consequences

QUESTION	ANSWER
How would you know it is for the same violation/accident to run concurrently?	The dates will be the same. ARTS will track this.
Is it only parking violations or non-moving violations example seat belt ticket?	The only exemption is parking violations. Other non-moving violations like a seatbelt ticket will trigger a suspension and delay, even if the SMRL holder is a passenger.
Will there be a reinstate or eligibility date to upgrade to an intermediate license on the driving record compliance? Is there going to be a hard stop when issuing if not able to upgrade or delay?	No, ARTS does not have this capability. Issuance staff will be required to determine eligibility. Every issuance must be reviewed on the driving record– not compliance. The driving record in addition to credential history will allow you to see what you need to make an issuance decision.
So, if a student gets in an accident & gets 2 violations at the time of the accident, would the suspension be 3+3 for a 6-month suspension?	Each ticket and each at-fault crash will result in a 3-month suspension. So, this SMRL holder would receive 3 separate 3-month suspensions. Remember, however, that the suspensions can run together (concurrently), so it may be rare that you would

	see them suspended for a total of 9 months since the suspensions may overlap.
Is it 3 months or 90 days, as some months have more or fewer days?	The legislation specifically states that it is a 3-month suspension and a 3-month delay.
Can they waive advance notice on these suspensions?	Yes, if the parent or guardian signs the required waiver form.
If they get more than one suspension, will it be like a rev83 and go back to IP?	No, we will no longer be following the MSL rules for students who receive violations after July 1 st , 2024, that required us to downgrade after a REV83. The new SMRL rules require a 3-month suspension (SUS177) for each and every violation.
If a SRML holder has 3 violations, does this mean the earliest date to upgrade to intermediate is 16 and 9 months if they reinstated after their suspensions and had a clean record for 6 months.	Yes, if the student had reinstated from their suspensions before their 16 th birthday, the 9-month delay would begin at age 16 provided the 6-months immediately preceding the upgrade to intermediate was with a clean driving record.
If I have held my IP/SMRL for 8 months, turn 16, my 3-month delay doesn't start until I have met the 1 year requirement?	Correct, we should begin counting the 3-month delay when the student meets the requirement of holding the IP/SMRL for 12 months total prior to upgrading. So they could upgrade at 16 years and 7 months old assuming they've had a clean driving record for the 6-months prior to upgrading.
Can the school make a request to have the SMRL revoked? If so, will the student go back to an instruction permit until they are 16 for the intermediate license with a clean driving record 6 months prior?	<p>Under the SMRL legislation, the school's role is to certify that the student is enrolled at the school. A school cannot request that the SMRL of one of their students be revoked if the student is still enrolled at that school and otherwise eligible to hold the license.</p> <p>If the student is no longer enrolled at the school and the school sends a letter withdrawing their certification for this reason, we would downgrade the student's SMRL to an instruction permit until they become eligible for an intermediate license.</p>
For minors that choose not to go to the new SMRL and decide to just maintain a regular IP. If they violate the terms of their IP, will they continue to have the same suspensions as they	The existing penalties and consequences for the instruction permit and intermediate license are not changing with this legislation. Only the MSL.

currently do, or will they also go to the same format/structure that the new SMRL is using (suspensions and delays)?	
Do these rules only apply to violations accrued on the SMRL?	Yes, the new rules that require a 3-month suspension and 3-month delay only apply to violations received after July 1 st . 2024.
What if it's an older student and turns 18 before the delay or suspension is complete?	At age 18, the SMRL rules no longer apply. Just like the GDL. They can be issued a full license if they otherwise qualify for it.
Do the delays stack before the 16th birthday?	No, the 3-month delays will begin (and do not run concurrently) after the SMRL holder turns 16 or otherwise become eligible to upgrade to an intermediate license.
What if the student delays getting their permit until age 15 ½? Would the 3-month delays still be added to their 16th birthday? Or would the delays begin at age 16 ½ because that is when they will have held their driving privileges for one year?	We would begin counting the 3-month delays at age 16 ½ in this situation when the student would have otherwise been eligible to upgrade to an intermediate license.
Can they still appeal their suspension for RDI?	They may appeal and appeal rights will still be listed on the suspension notice. However, the new legislation makes the suspensions mandatory (the department <i>shall</i> suspend instead of the department <i>may</i> suspend) so there is no longer any discretion to replace a suspension with RDI.
And there is no way to appeal the 3-month delay, correct?	Correct, the 3-month delay is triggered by a violation/conviction. The SMRL holder would need to appeal the underlying conviction.

Application/Forms

QUESTION	ANSWER
When are the letters going out to MSL holders?	The letter to MSL holders will be given to the post office on Friday, June 28 th .
If a current MSL holder doesn't get the letter by July 1st, is there a grace period if they didn't know that it was coming into effect?	No, the SMRL rules will be effective July 1 st for all current MSL holders regardless of when they receive the letter.
How soon will we get the new forms and new rack cards?	The new forms (430021 and 430022) will be available online on July 1 st to print. We plan to have electronic versions of the updated rack cards available for you by July 1 st also. The forms

	and rack cards will be ordered in bulk and sent to all locations as soon as possible but it will be after July 1 st .
Can we give the printout of the new rack card to the customers before we receive them?	Yes, you can provide a printout of the updated rack card on July 1 st or after but it may be just as effective to hand them the update form 430021 as it contains the same information as the rack card.
Will the DOT send packets of form 430022 or is it on each location to have them on hand if they prefer?	We are planning to order packets of the new forms and rack cards for all locations as soon as they are available. Following this initial shipment, each location should follow the inventory ordering process that they follow for all other form ordering. Until you receive the shipment of the new forms, you will need to print off a supply to have available to hand to customers.
Does this form have to be scanned into Arts? Do we supply this or are they to print this off DOT?	Form 430021 Affidavit for SMRL will be scanned into ARTS just as we did with the previous MSL version of the form. The new Form 430022 Parental Consent for SMRL is not reviewed by issuance staff or scanned into ARTS, it is carried by the SMRL holder in the vehicle for law enforcement to review. We should have copies of both forms available in all of our DL locations and the forms will be available to print from our website as of July 1 st , 2024.
How many Form 430022 can the student have in their car?	As many as they need to list all of the approved locations their parents are providing consent for them to drive to. They should complete new forms and toss old ones as needed and avoid carrying outdated forms that may lead to confusion with law enforcement.
July 1st will everyone issued a SMRL or those holding a current MSL need to carry the new form with them?	Yes, on July 1 st all current MSL holders and new SMRL holders will need to begin carrying Form 430022 with them in the vehicle. All current MSL holders should receive a copy of the form in the mail and we will hand the form to customers when we are issuing a SMRL.
Can we give them a copy of the form 430021 affidavit to customers so they can have that information to refer back to?	Absolutely. They will also be able to access the form on our website at https://iowadot.gov/mvd/driverslicense/Under-18 .

If a parent or school official has questions on the SMRL, can they email them directly to MVD Learning and Development?	NO – staff should try and answer questions using the tools we have provided. The website is the best resource to direct someone with questions.
For the live signature requirement from the school, we have some schools signing a form and making copies, can we accept that?	Iowa code requires the school to certify the student's enrollment prior to issuance of a SMRL. If a school stamps or signs the form and then photocopies and distributes widely for use, it stands to reason that the school is not reviewing each form to determine that the student listed is enrolled at the school. We are requiring a live or electronic signature and the original form (not a copy) in order to comply with the statutory requirements for the license.
Are there any plans to provide the new SMRL affidavit and notify all the schools that the affidavit requires a live signature from the principal or superintendent effective July 1?	Yes, we will be providing the new updated Form 430021 Affidavit for SMRL to schools and explaining the signature requirements.
How long will we accept the old MSL forms? 6mo? 12mo?	We do not have a time frame for this yet and will notify you when we determine that we will no longer accept the old Form 430021 Affidavit for MSL.