

Motor Vehicle Division Informational Memo # 24-11 Any County Titling Under Iowa Code 321

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TO: All Motor Vehicle Division staff

Iowa County Treasurers and staff
Iowa Automobile Dealers Association

Iowa Independent Automobile Dealers Association

Iowa Department of Revenue

SUBJECT

This information memo explains the Iowa DOT's implementation of HF674 from the Iowa 2024 legislative session. HF674 changed several provisions of Iowa Code 321 with two primary points of emphasis:

- 1. HF674 allows for most vehicle title or ownership products to now be issued by any county, regardless of where the applicant resides.
- 2. HF674 increased three fees related to vehicle titling and increased the amount retained by county treasurers.

This information memo will focus solely on item #1 and will refer to this combined set of title issuance changes as "Any County Titling" or "AC titling" or title. This information memo supersedes IM 22-04 that referred to the prior allowance for Contiguous County titling Iowa DOT is publishing a second information memo IM 24-12 to focus specifically on the fee increase / county retainage provisions of HF674.

SUMMARY

In 2024, the lowa legislature amended lowa Code chapter 321, to allow for initial title and registration transactions and other related title transactions to be conducted in any county. Prior to this change, initial titles and related products could be conducted only in the applicant's county of residence or, for certain products, in a county contiguous to the county of residence.

The Iowa DOT will implement AC Titling by the legislatively required start date of January 1, 2025. This memo explains the new process and addresses common questions. For readability and clarity, we have included three appendices to this memo with questions and answers divided into the following categories:

- Appendix A: County Processing Questions
- Appendix B: Forms and ARTS Questions
- Appendix C: ERT and Vehicle Dealer Questions

CURRENT

For certain title and registration transactions, an applicant must apply to the county of residence or contiguous county of the owner, lessee, or primary user for processing under lowa Code 321.20.

NEW

On January 1, 2025, an applicant may still apply to their county of residence but may also apply to the county treasurer of any county for these title, registrations, and related transactions:

- Regular title and registration (321.20)
- Interstate motor carrier title (Prorate title) (321.20A)
- Title and registration for specially constructed vehicle (321.23)
- Replacement title (321.42)
- Dealer titles (321.48)
- Security Interest (321.50)
- Junking certificates (321.52)

- Salvage titles (321.52)
- Rebuilt (321.52) (4)(C)
- Delinquent Dealer Title (321.70)
- In-transit title (321.109)
- Non-transferable registration (321.109)
- Title after Non-transferable registration (321.109)
- In-transit plates (321.109)
- 30-day permit (321.109)

BUSINESS IMPACT

Any County Titling requires many form changes and programming in the lowa title and registration system. The lowa DOT has worked with a number of internal and external stakeholders to address these changes.

Form changes – these forms have changed due to the requirements of HF674. Starting on January 1, 2025, only these versions of the following forms should be used:

- Form 411007 Application for Certificate of Title and/or Registration for Purchased Vehicle.
- Form 411179 Application for Certificate of Title and/or Registration for Leased Vehicle.
- Form 411033 Application for Replacement of Iowa Certificate of Title to a Motor Vehicle.
- Form 411185 Certificate of Disposal of Abandoned Vehicle
- Form 411163 (Private Form) Certificate of Disposal of Abandoned Vehicle
- Form 411356 Insurer Affidavit
- Form 411046 Application for Notation of Security Interest.
- Form 411168 Cancellation of Security Interest
- Form 411067 Affidavit of Foreclosure Sale
- Form <u>411006</u> Application for Iowa Replacement Plate

System changes

- Iowa DOT title and registration system (ARTS)
- Iowa DOT Electronic Registration & Title (ERT) service
- Iowa DOT Webservice (go between for ARTS and ERT)

TERMINOLOGY

This memo uses certain terminology that may not be familiar. Definitions of this terminology are included below.

- Initial Title and Registration Transaction: Initial title and registration transactions means anytime a new title or ownership document is issued.
- *Issuing County*: The county that completes the initial titling and registration transaction. This may be, but is not necessarily, the same as the Managing County under Any County Titling.
- *Managing County*: The county of residence that handles all registration renewals.
- *Title*: A title is the official document issued by the Iowa DOT or county treasurer that confirms ownership of the vehicle to the indicated party or parties on the title. This document might refer to different title products such as "Regular title", "Dealer Title," "In-transit title," etc. because they are authorized as such in law and the Iowa title and registration system may have different processes to deliver each transaction. However, if not specified,

- using the word "title" in this information memo should be taken in the broadest sense.
- Registration period: The registration period runs from the time the vehicle is initially registered up to the
 renewal of the annual registration. Depending on when the vehicle is registered, and the month chosen for
 renewal it may not be a full calendar year.

HELPFUL QUESTIONS AND ANSWERS

The following questions and answers provide additional information that will be helpful to you and to customers.

1. WHY IS THE IOWA DOT IMPLEMENTING ANY COUNTY TITLING UNDER IOWA CODE 321.20 AT THIS TIME? In the 2024 lowa legislative session, the legislature passed the any county titling to allow customers to complete the certain title and registration transactions at any county including their county of residence. This law will replace the contiguous county titling and will be implemented by January 1, 2025.

2. HOW WILL ANY COUNTY TITLING IMPACT COUNTIES?

We anticipate three specific changes:

- Forms. Any County Titling requires changes to the Title & Registration application forms (Forms 411007 and 411179, specifically). Beginning in May 2024, the lowa DOT has worked with key stakeholders to review these forms. This stakeholder group identified changes to comply with 321.20 as well as other changes to promote efficiency and customer service. The updated forms 411007 and 411179 will be shared with the dealer associations and the county treasurers and will be ready for deployment for the January 1, 2025, deadline. Other form changes are identified above.
- ARTS and ERT. The Iowa DOT and the ERT Partnership Group have examined the changes that will be needed to IT functions, including in ARTS and ERT. These changes will be programmed with a deployment date to meet the January 1, 2025, deadline.
- <u>Education.</u> Any County Titling will require substantial outreach to customers and dealers to help them understand the process. We will work with all counties and our lowa DOT Strategic Communications team to identify proactive communication for Web, social media, and other media options as we move closer to the deployment date.

3. WHAT TRANSACTIONS MAY BE COMPLETED IN ANY COUNTY, INCLUDING COUNTY OF RESIDENCE ON AND AFTER JANUARY 1, 2025?

The most common transaction affected by Any County Titling is the initial title and registration application authorized under Iowa Code 321.20. Under statute, this transaction is expressly authorized to be completed in any county including the county authorized under Iowa Code 321.20, namely, the customer's county of residence. However, other code sections cross-reference or utilize Iowa Code 321.20. The legislature wrote Iowa Code 321.20 to apply "notwithstanding" other provisions of Iaw. The Iowa DOT and stakeholders have reviewed other common transactions. See page 4 for transactions authorized to be completed at any county including the customer's county of residence.

The following transactions are authorized to be completed at any county including the customer's county of residence:

| ANY COUNTY ELIGIBLE TRANSACTION | RATIONALE | ELIGIBILITY FOR AC BASED ON |
|--|---|---------------------------------------|
| Initial Title and registration application single and multiple owners/lessees. | lowa Code 321.20 addresses the title and registration application and expressly includes any county. Note for multiple: The Issuing County may be different than the county of residence for any one of the owners/lessees. | Purchase Date |
| Prorate Title | lowa code 321.20A an owner may apply to any county treasurer for title, but registers with the lowa DOT for registration separately under lowa code 326. | Purchase Date |
| Specialty Constructed Vehicle | lowa code 321.23 an owner may title and register a specialty constructed vehicle at any county. | Purchase Date |
| Replacement title and Recreate Title | Under lowa Code 321.42(2)(a), the customer may apply to any county treasurer for a replacement title. | Received Date |
| Dealer Title | Under 321.48 Dealers may apply to any county for a dealer title. | Purchase Date |
| Security interest notation | Iowa Code 321.50 will allow the security interest to be added or removed by any county. | Received Date |
| Salvage title | Under Iowa Code 321.52, may apply at any county for salvage certificate. | Application Date |
| Junking certificate | Under Iowa Code 321.52, may apply to any county for junking certificate. | Purchase Date |
| Title and registration application for a repaired vehicle that has passed the salvage-theft examination (Rebuilt). | lowa Code 321.52(4)(c) allows a customer to obtain a regular title and registration from a salvage title and a salvage theft examination. This is then a title and registration application under lowa Code 321.20. | Purchase Date |
| Delinquent Dealer title and registration | lowa Code 321.70 requires a dealer to register a delinquent vehicle. This is then a title and registration application under lowa Code 321.20 | Purchase Date |
| 30-Day Permit | lowa code 321.109 allows a customer to obtain a 30-day permit from any county. | Application Date |
| In-transit Title | lowa code 321.109 allows a customer to obtain an in-transit title from any county. | Purchase Date |
| In-transit Plate/Permit | lowa code 321.109 allows a customer to obtain an in-transit plate/permit from any county. | Application Date |
| Non-transferable Registration and Title following a Non-transferable Registration | lowa code 321.109 allows a customer to obtain a non-transferable registration from any county. | Date the vehicle is brought into Iowa |

4. DOES THE ANY COUNTY TITLING PROVISION INCLUDE A REPLACEMENT TITLE FOR A PRORATE OR OFFICIAL TITLE? Yes. This is the same as other titles, any county may process a replacement title for a Prorate or Official title.

5. WHEN CAN A DEALER USE THE ANY COUNTY TITLING PROVISION?

When a dealer applies for a title and registration, or a dealer title. This also includes when a dealer brings a delinquent vehicle current. The proper procedure is for the dealer to apply for a title and registration to bring the vehicle current (prior to putting the vehicle into their inventory/being held for resale).

6. WHAT ARE SOME EXAMPLES OF INITIAL TITLE AND REGISTRATION TRANSACTIONS?

Any time a vehicle is purchased, the new owner or dealership would apply for a new title. The second type of transaction would be If you add or remove another owner to an existing title. The third would be for a dealer title application on foreign and non-foreign vehicles.

7. WHAT SUBSEQUENT TRANSACTIONS ARE COMPLETED IN THE ISSUING COUNTY ON AND AFTER JANUARY 1, 2025? Some transactions occur during or after the initial title and registration transaction and require the customer to return to the Issuing County. These transactions are not title-and-registration transactions under Any County Titling. Since the Issuing County may be any county, the customer would need to return to the Issuing County for the following subsequent transactions.

| ISSUING COUNTY TRANSACTIONS | RATIONALE |
|--|---|
| Corrected title | Title-only transaction. Issuing County since that is where the title is originally issued and is the only county to authorize a Correction and waiving associated fees. |
| Additional fee for new registration | This is not a title and registration transaction. Issuing County because the Issuing County has the information about the original transaction to best help the customer. |
| Void title | Title-only transaction. This transaction may require a refund, and therefore Issuing County is best suited to handle. |
| Replacement registration certificate during first period of registration | Replacement registration will be allowed in the issuing county only during the first registration period. |
| Replacement license plates <u>during</u> <u>first</u> period of registration | Replacement plates will be allowed in the issuing county only during the first registration period. |

8. MAY A CUSTOMER GO TO ANY COUNTY TO GET A CORRECTED TITLE?

A corrected title can technically be done in Any County but if done outside of the original issuing county then fees need to be charged. If the title was issued in a county that is not the county of residence, a corrected title should be obtained from the county that completed the initial transaction. ARTS will automatically charge the title fee and SI application fee. The county may adjust the fee out for a legitimate reason, such as county error. However, if a customer goes to a county other than the original issuing county for a correction based on customer error (such as providing an incorrect address or odometer reading", then the fees will charge, and the county should not adjust them out. The customer must provide documentation to correct the incorrect information on the new title.

9. MAY A CUSTOMER REQUEST A REPLACEMENT REGISTRATION CERTIFICATE IN ANY COUNTY?

This answer depends on when the customer is asking for a replacement registration certificate. Under Iowa Code 321.42, a replacement registration certificate is intended to replace the existing version of the registration certificate. If the customer is in the first registration period, the registration certificate will list the Issuing County during the first registration period only, however, the customer may obtain a replacement registration in their managing county at any time.

10. WHAT TRANSACTIONS ARE ALWAYS COMPLETED BY MANAGING COUNTY?

The below transactions are always completed by the Managing County. This is because these transactions are not title and registration transactions, but either only title or only registration and therefore Iowa Code 321.20 does not apply.

| MANAGING COUNTY TRANSACTIONS | RATIONALE |
|---|---|
| Vehicle renewals | Registration-only transaction under Iowa Code 321.40. |
| Parking ticket stops | Registration-only transaction under Iowa Code 321.40(8). |
| Small trailers or homemade trailers that do not have a title | Registration-only transactions under lowa Code 321.123. |
| Manufacturer Buy Back titles | Title-only transaction. Iowa Code 322G requires titling in the Managing County of the transferor. |
| Replacement registration certificate <u>after first</u> registration period | Replacement registration will be allowed in the managing county at any time. |
| Replacement license plates <u>after</u> <u>first</u> registration period | Replacement plates will be allowed in the managing county at any time. |

11. CAN A HOMEMADE TRAILER THAT IS OVER 2,000 POUNDS BE ELIGIBLE FOR ANY COUNTY PROVISION?

Yes. Since a homemade trailer over 2,000 pounds is titled, that transaction is allowed to take place in any county. If the homemade trailer is less than 2,000 pounds, it is registration only and would not be eligible for the any county provision.

12. WHAT COUNTY NAME WILL BE LISTED ON THE LICENSE PLATE IF AN INITIAL TITLE AND REGISTRATION TRANSACTION IS COMPLETED IN AN ISSUING COUNTY?

The Issuing County name will appear on any plate issued under an initial title and registration transaction for license plates required to contain a county name under Iowa law. Customers should be aware that applications to title and register in a county other than their county of residence will result in the license plate containing the Issuing County name.

13. WHAT IF THERE ARE ADDITIONAL QUESTIONS?

We recognize there are many questions related to the new Any County Titling process. For readability and clarity, we have included three appendices to this memo divided into the following categories:

- Appendix A: Processing Questions
- Appendix B: Forms and ARTS Questions
- Appendix C: ERT and Dealer Questions

For ease of reference, we have continued forward the numbering system into the appendices.

APPENDIX A: PROCESSING QUESTIONS

14. WHAT HAPPENS WHEN A LIEN HOLDER OR DEALER SUBMITS THE NOTATION FOR SECURITY INTEREST TO ONE COUNTY AND THE TITLE APPLICATION IS PROCESSED IN ANOTHER COUNTY? WOULD THE COUNTY THAT RECEIVED THE TITLE APPLICATION SEE THAT THE SECURITY ESCROW IS ATTACHED TO THE VIN?

The county that receives the notation of security interest will use a specific function in ARTS that will show the transaction and allow the title and registration to process in a different county. If the security interest escrow is placed prior to January 1, 2025, and the title is processed after January 1, 2025, the counties will need to adjust the additional \$10 lien notation fee off the transaction.

15. MAY A CUSTOMER COMPLETE A VOID TITLE TRANSACTION IN ANY COUNTY?

The void title process is a title-only transaction and therefore, the existing process will not change under Any County Titling. We recognize that the void title transaction may be completed through ARTS in any county, but we encourage void titles to only be handled by the Issuing County. This is because if the title is voided because the title was completed in error, there may be a refund associated with the void title transaction. The refund would need to be handled by the county that owes the refund, which would be the Issuing County.

16. MAY A CUSTOMER COMPLETE A REPLACEMENT PLATE TRANSACTION IN ANY COUNTY?

This answer depends on when the customer is asking for a replacement plate. If the customer is in the first registration period, the replacement plate will list the Issuing County during the first registration period only, however, the customer may obtain a replacement plate in their managing county at any time. When a customer needs to replace a plate, a sticker will also need to be issued.

17. MAY A CUSTOMER COMPLETE A REINSTATE TITLE TRANSACTION IN ANY COUNTY?

Yes. Any county may initiate the Reinstate Title Transaction, but ultimately it will require Vehicle Central Programs team to finalize. Please note that this is a very rare process. We recommend that either the Managing County, or the Issuing County if the Issuing County handled the initial title and registration application, handle the reinstate title transaction. This is because those counties are most likely to have the background for why the reinstate title transaction is appropriate.

18. IF A CUSTOMER DESIGNATES A DEALER OR LESSOR AS POWER OF ATTORNEY AND THE DEALER OR LESSOR PROVIDES THE VALID POWER OF ATTORNEY, MAY THE AGENT DECIDE ON BEHALF OF THE CUSTOMER TO TRANSACT IN ANY COUNTY?

Yes, if the transaction is eligible for Any County Titling and the customer has signed a valid Power of Attorney to provide authority to the agent to make any choices on the transaction, the agent may select the county box on the title and registration application.

19. MAY ANY COUNTY REFUSE TO COMPLETE A TRANSACTION FOR A CUSTOMER IF THE COUNTY KNOWS THE CUSTOMER HAS TRIED TO TRANSACT IN OTHER COUNTIES AND THE CUSTOMER WAS TURNED AWAY IN THE OTHER COUNTIES FOR FRAUD CONCERNS?

Counties have the authority to refuse a title and registration transaction due to fraud under Iowa Code 321.30. We recommend that if one county suspects fraud, the county place an exception case on the vehicle record in ARTS to alert other counties. If fraud is certain, the county may add an Exception to stop any future transactions. We also recommend contacting a Bureau of Investigation and Identity Protection investigator for further action.

20. IS ANY COUNTY REQUIRED UNDER IOWA LAW TO FOLLOW A MANAGING COUNTY'S CASH-ONLY NOTATION ON A CUSTOMER RECORD?

No, the cash-only notation is not a hard stop to a transaction under lowa law. The Issuing County may, but is not required to, enforce the cash-only notation. We encourage counties to work together to solve these discretionary processing issues as they arise.

21. IS AN ISSUING COUNTY REQUIRED TO FOLLOW ANOTHER COUNTY'S INSUFFICIENT FUNDS STOP ON A CUSTOMER?

Yes. Cross County Titling will not change the existing insufficient funds processes. An insufficient funds stop will continue to be a hard stop and the customer must clear the insufficient funds stop with the county that placed the stop. A customer will be unable to register a vehicle with an insufficient funds stop. This includes if a dealer has already collected fees.

22. IF A CUSTOMER STARTS AN ANY COUNTY-ELIGIBLE TRANSACTION IN ONE COUNTY AND NEEDS TO HALT THE TRANSACTION FOR ANY REASON, MAY THE CUSTOMER FILL OUT A NEW APPLICATION AND GO TO A DIFFERENT COUNTY?

Yes. A customer may withdraw an application at any time. However, the customer will need to complete a new application. The customer cannot cross out or edit the any county assignment on the title and registration application. We also suggest that if staff in the first county (where the transaction started) identify any anomalies with the transaction, staff may want to add an exception case to the vehicle record in ARTS so that a subsequent county is aware of the issue and can address as needed.

23. HOW SHOULD A COUNTY PROCESS AN APPLICATION THAT DOES NOT HAVE THE ANY COUNTY BOX CHECKED?

If the application is received by the Managing County, then it should be transacted. If the application is received by another Issuing County, the sender will need to be notified that the remaining items need to be completed on the form including to check the box and to list the county for that County to transact or that the application should be sent to the Managing County.

24. HOW SHOULD A COUNTY PROCESS AN APPLICATION THAT HAS THE ANY COUNTY BOX CHECKED BUT NO SPECIFIC COUNTY LISTED?

We encourage counties to make sure they have sufficient information to confirm which county the sender intended before completing the transaction. For example, County 1 could be inferred from County 2 receiving the application and the check is written to County 1. If there is doubt that the customer intended the county that received the application to transact it, we recommend that the sender be notified that additional information is needed to complete the transaction. Options include instructions to either list a specific county or to submit a new application with the box unchecked. Counties should be aware that processing an application where the specific county intent is unclear may lead to more complications for both the customer and the counties if the transacting county was not intended, including reissuing title, reissuing registration, which county should receive the fees, and reissuing license plates.

25. HOW SHOULD A COUNTY PROCESS AN APPLICATION THAT HAS THE ANY COUNTY BOX UNCHECKED BUT FILLS IN A DIFFERENT COUNTY NAME IN THE SAME LINE?

We encourage counties to make sure they have sufficient information to confirm which county the sender intended before completing the transaction. This may include, if the customer has written a check, confirming which county the customer wrote the check to. When a specific county name is written into an application, we believe the following assumptions are appropriate:

- An issuing county receives an application with their specific County written in, but the box is unchecked. The title specifically states, "If the box is unchecked or the authorized county is not listed, the application shall be made to the county of residence...."
- Managing County receives an application with a specific County written in, but the box unchecked. If it is
 unclear from other information which county was intended, the Managing County should notify the
 sender that additional information is needed. Options include instructions to either check the box to
 authorize that county or to submit a new application with the box unchecked and blank unfilled.
- If a county receives an application with a different county's name on the application, the sender should be notified that additional information is needed to complete the transaction.

26. WILL AN ISSUING COUNTY BE REQUIRED TO ADOPT THE DISCRETIONARY CHOICES A MANAGING COUNTY MAY HAVE FOR PROCESSING THESE TRANSACTIONS?

There are many aspects of county titling operations that are not specified by law but are subject to county discretion in managing their operations. We recommend that each county clearly define and consistently apply its policies as

needed. Any County may, but is not required to, adopt discretionary policies of a customer's Managing County. We encourage all counties to confirm that a particular policy is discretionary and not required in law prior to transacting.

27. WILL ALL COUNTIES SHARE THE SAME BUREAU OF INVESTIGATION AND IDENTITY PROTECTION INVESTIGATOR?No. This may happen by coincidence that one or more counties will share a Bureau of Investigation and Identity Protection investigator. But it is not possible that all counties will share an investigator.

28. WILL THE IOWA DOT BE PROVIDING ADDITIONAL PRINTERS AND/OR COMPUTERS WITH ARTS ACCESS IF A COUNTY ANTICIPATES A SIGNIFICANT INCREASE IN TRANSACTIONS?

At this time, the Iowa DOT is not anticipating providing additional printers or computers with ARTS access to any counties based on Any County Titling. As data is gathered under Any County Titling for transaction numbers, we will reevaluate as needed.

29. MAY A COUNTY RESTRICT IN-PERSON ANY COUNTY TITLING TRANSACTIONS TO CERTAIN TIMES OF DAY OR CERTAIN DAYS OF THE WEEK?

We defer to counties on business decisions related to how to manage their transactions. However, we encourage counties to treat Any County Titling transactions equally to other similar transactions because doing so will provide counties more accurate numbers of Any county transactions. This path will also reduce the risk of noncompliance with lowa Code 321.20, which requires a county to allow any county transactions.

30. IF A CUSTOMER HAS A NON-TRANSFERRABLE REGISTRATION AND SUBSEQUENTLY RECEIVES THE TITLE TO TRANSFER THE VEHICLE, WHERE MAY THE CUSTOMER TRANSACT TO RECEIVE A NEW TITLE AND REGISTRATION?

A customer with a non-transferrable registration that subsequently receives title and wishes to title and register the vehicle may transact in any County. This is because the customer is completing an initial title and registration application under Iowa Code 321.20 in this scenario.

- As an example, if a person moves into Ames with a Nebraska registration but does not have the title, the
 customer will apply for non-transferrable registration in any county. If the customer later wants to trade the car
 into the dealership, the customer must receive the title (free of liens) from the title holder to complete the trade.
 This transaction is a new title and registration application, and therefore the customer may complete the
 transaction in any County.
- Customer moves to Iowa and Lien holder retains title in other state bank once Ioan is fulfilled sends title to customer.
- If the customer trades vehicle into dealer before lien is released and dealer pays off lien. Proceed like normal.

31. HOW MANY DAYS DOES THE COUNTY TREASURER'S OFFICE HAVE TO PROCESS A TITLE APPLICATION?

Dealerships and vehicles sold privately are required to have the title application submitted to the county within 30 days from the date of purchase. Iowa code does not specify how many days the Treasurer's office has to process that transaction.

APPENDIX B: FORMS AND ARTS QUESTIONS

32. HOW WILL ANY COUNTY TITLING AFFECT FORMS?

The main changes pertain to Form 411007 for purchased vehicles and Form 411179 for leased vehicles to comply with Any County Titling. The new forms both include any county authorization to confirm the applicant intends to utilize Any County Titling. There will be minor changes to form 411185 and 411163 private form for abandoned vehicle, 411356 insurer's affidavits, 411033 for replacement title, 411046 for notation of security interest, 411067 affidavits for foreclosure sale, and 411168 cancellation of security interest.

33. MAY A CUSTOMER OR DEALER USE THE OLD FORMS ON AND AFTER JANUARY 1, 2025?

Yes, the current title and registration forms dated 01-22 will remain valid but may only be submitted to the Managing or a contiguous County. The current title application dated 1/22 will not have the any county authorization and therefore the form cannot be used in any county transaction. To transact in any county, the customer or dealer must have the new title application dated 1/25.

34. IF A COUNTY OTHER THAN THE ISSING COUNTY IS ADDING A SECURITY INTEREST, DO THEY NEED THE TITLE PACKET FROM THE ISSUING COUNTY?

No. Only form (411046) is required to process adding a security interest. Therefore, collecting the title packet is not required.

35. WHAT DOCUMENTATION WILL A COUNTY NEED WHEN REQUESTING RECORDS FROM AN ISSUING COUNTY?

We encourage the counties to follow a consistent practice for each request of documentation needed to assist customers in another county. A county may require a form to be filled out to send records to another county. We encourage counties to work together efficiently to serve the customers.

36. WILL A DISCRETIONARY EDIT FOR INCORRECT COUNTY STILL APPEAR ON RENEWALS?

Yes. Since renewals are only allowed for a managing county, the discretionary edit will appear.

APPENDIX C: ERT AND DEALER QUESTIONS

37. IF A DEALER OR CUSTOMER IS FROM A SPECIFIC COUNTY BUT MAILS (OR USES A DROP BOX) WITH THE OLD APPLICATION AND A CHECK, MAY THE COUNTY ENDORSE THE CHECK AND SEND THE APPLICATION AND CHECK TO THE CORRECT ISSUING COUNTY?

We defer to county discretion. If the two counties agree, the first county may send the endorsed check and application to the second county. However, the first county may also return the application and check to the dealer or the customer, as appropriate.

38. HOW WILL IOWA DOT COMMUNICATE THE ANY COUNTY CHANGES TO OUT-OF-STATE DEALERS?

Iowa DOT will consult with IADA and IIADA for their assistance contacting dealer counterparts in other states. We also encourage counties to reach out to frequent dealers in the area. We will also work with motor vehicle agencies in neighboring jurisdictions to communicate the change.