

Motor Vehicle Division Information Memo # 19-11

Nonoperator's Identification Card Administrative Rule Updates

DATE: June 11, 2019

FROM: Sara Siedsma, Compliance Officer, MVD

TO: All Driver and Identification Services staff, Iowa County Treasurers and County Treasurer's staff
the issue driver's licenses and non-operator's identification cards

SUBJECT

This informational memo explains an update to administrative rule chapter 761—630, Nonoperator's Identification.

SUMMARY

The update to this rule chapter aligns with existing legal authority and department practice, replaces the term "driver's license station" with the more updated term "driver's license service center" and eliminates an outdated effective date from the rules. This memo also officially extends the policy allowing a driver's license (DL) to be renewed within 180 days of the expiration date to also apply to a non-operator's identification card (ID).

The administrative rule amendments are effective June 12, 2019.

LINK TO ADMINISTRATIVE RULES

<https://www.legis.iowa.gov/docs/aco/arc/4437C.pdf>

CURRENT

Previously, administrative rule chapter 761—630 contained outdated terminology and effective dates and did not fully reflect our current processes and procedures relating to early renewal of a nonoperator's identification cards.

NEW

As of June 12, 2019, the rules will reflect updates to outdated terminology and remove an obsolete effective date, and this memo also officially documents the policy allowing an ID card to be renewed within 180 days of the expiration date.

BUSINESS IMPACT

This directive does not significantly impact the way that DIS operates as we have already updated our messaging to reflect driver's license service centers rather than driver's license stations, and we have also already extended the policy of allowing an early renewal within 180 days of the expiration date of the credential to ID cards. This directive is just simply meant to inform you that the administrative rules have now been updated and to officially document that the 180-day early renewal also applies to ID cards.

HELPFUL QUESTIONS AND ANSWERS

The following questions and answers provide additional clarification which will be helpful to you and to customers.

WHY IS EARLY RENEWAL OF AN ID CARD DOCUMENTED IN POLICY RATHER THAN THE ADMINISTRATIVE RULE?

Historically in the Iowa Code, the ID card has been subject to the same “non-driving” requirements that apply to a driver’s license. For example, the language in Iowa Code section 321.190(1)(a) governing ID cards references that an applicant for an ID card shall apply for the card in the same manner as a driver’s license, as provided in Iowa Code section 321.182. Similarly, the card contents, renewal and duplicate procedures applicable to a DL in the code have also been applied to the ID card. Because of this interpretation and historical practice, this memo is just officially documenting our current process that extended the 180-day early renewal policy for driver’s licenses, as documented in administrative rule 761—605.25(2), to also apply to early renewal of ID cards.

WHAT CONSTITUTES “GOOD CAUSE” WHEN DETERMINING WHETHER TO RENEW AN ID CARD EARLIER THAN 180 DAYS?

Like early renewal of a driver’s license in administrative rule 761—605.25(2), which allows the license to be renewed within 180 days before the expiration date unless impractical, we may renew the ID earlier for good cause.

Good cause is not defined in the rule, but below are some general guidelines of what may constitute good cause to allow an ID renewal earlier than 180 days of the expiration date:

- The customer attends school in another state or country, the customer travels to other states or countries for extended periods of time, or the customer works for the Peace Corps, or other entity primarily operating in another state or country.

Good cause would generally not be met if the customer has less than one year before their ID expires and they show up to obtain a duplicate card, but don’t fall into any of the criteria listed above.

If you have questions about what constitutes good cause in a particular case that falls outside of the general guidelines listed above, please consult with your supervisor or county liaison who may approve the renewal if they determine good cause has been met.