

Vehicle Licensing Guide

Odometer Reading Disclosure, Discrepancies and Corrections VLIC-3.520

Original Date: 03/27/1978

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POLICY	
Title: Odometer Reading Disclosure, Discrepancies, and Corrections	
Effective Date: 03/27/1978	Revision Date: 08/27/2015
Authority: Code of Virginia: § 46.2-629 , 46.2-1500 , Federal Truth in Mileage Act Regulations: 49CFR580 , et. seq.,	
Policy: DMV will provide information and instructions to individuals and dealers in whose name a motor vehicle is titled to ensure they record correct odometer reading disclosures in accordance with the federal Truth in Mileage Act Regulations, (49CFR580, et. seq.) when there is a transfer of vehicle ownership. <<<<<REVISION DMV may make odometer corrections to vehicles titled in Virginia for individuals and licensed dealers who provide supporting documentation proving the incorrect odometer reading was recorded when a vehicle was titled in Virginia. NOTE: Virginia DMV is NOT authorized to make corrections to odometer readings on out of state vehicle titles that were recorded incorrectly. Customers must be advised to return to the state in which the vehicle was titled to have the odometer reading corrected. END REVISION>>>>>	
Exception: N/A	

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BACKGROUND

Odometer disclosure statements are designed to comply with federal and state odometer disclosure laws. The Federal Truth in Mileage Act Regulations (49CFR580, et. seq.) require that an individual or dealer in whose name a motor vehicle is titled disclose the odometer reading when there is a transfer of ownership. This protects both the buyer and the seller.

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DEFINITIONS

Assignment of Title -- transfer of ownership from the titled owner (seller) of a motor vehicle to the purchaser. This assignment is made on the title certificate in the section so labeled.

Reassignment of Title -- transfer of ownership from one licensed dealer to another licensed dealer or a retail purchaser.

Conforming Title Certificate -- A title certificate that DOES contain a space for both the titled owner (seller) and the buyer to sign and print their names to disclose the odometer reading upon transfer of vehicle ownership.

Non-Conforming Title Certificate -- A title certificate that does NOT contain a space for both the titled owner (seller) and the buyer to sign and print their names to disclose the odometer reading upon transfer of ownership of a motor vehicle.

- Older versions of title certificates also may not contain a space to disclose the odometer reading. In this instance, the seller may disclose the odometer reading by writing it in a blank space in the assignment section of the title certificate. However, when a dealer receives an older title certificate, the first reassignment of the vehicle must be made on a secure dealer reassignment form where the dealer representative and the buyer sign and print their names to disclose the odometer reading. Also, the [VSA-5](#) may be completed to record the odometer reading for casual sales.

Secure Dealer Reassignment Form “Reassignment of Title by Virginia Motor Vehicle Dealer” (VAD-20) – A paper form with security features built into the paper which makes alterations visible to the naked eye. These forms:

- Are only to be used by licensed dealers (Virginia and Out-of-State).
- Contain space for both the dealer representative and the buyer to sign and print their names to disclose the odometer reading upon transfer of ownership of a motor vehicle.

“Power of Attorney To Sign For Owner When Registering and/or Transferring Ownership of A Motor Vehicle” (VAD-70A) – A paper form with security features built into the paper that makes alterations visible to the naked eye. This form is only used by licensed dealers, numbered for inventory control, and contains space for both the dealer representative and the buyer to sign and print their names to disclose the odometer reading upon transfer of ownership of a motor vehicle.

- In the event of multiple names listed as either the sellers OR the buyers, only one seller or one buyer is required to sign a VAD-70A to disclose the odometer reading.
- Motor Vehicle Dealers **may not** use the “Power of Attorney to Sign For Owner” (VSA 70) to change ownership of a motor vehicle. (Refer to [VLIC-3.525](#))

Manufacturer’s Statement of Origin (MSO)/Manufacturer’s Certificate of Origin (MCO) -- A document provided by the manufacturer of a new motor vehicle, or its distributor which is the only valid indication of ownership between the manufacturer, its distributor, its franchised motor vehicle dealers, and the original purchaser not for resale that contains space for both the seller and the buyer to sign and print their names to disclose the odometer reading upon transfer of vehicle ownership.

- DMV no longer requires that the "printed" name on the odometer disclosure be hand-printed for dealership transactions. Dealership computer-generated, typed, or stamped names are acceptable, as long as it has an original signature.
- For DMV internal purposes, the MCO/MSO can be considered the vehicles "birth certificate". The MCO/MSO is the first record of the vehicle's existence and is the link between the vehicle's "manufacturer/distributor/franchised motor vehicle dealer" and the first retail purchaser.

DMV Odometer Disclosure Statement (VSA-5)/Non-Secure Out of State Odometer Disclosure Form – A non-secure form used by individuals for disclosing an odometer reading with a non-conforming title certificate for the assignment of ownership from the titled owner (seller) to the buyer or by licensed dealers with the sale of a new vehicle via an MSO or MCO.

- If multiple names are listed as either the sellers OR the buyers, only one seller or one buyer is required to sign a VSA-5 to disclose the odometer reading.
- Lessees (individual paying to use vehicle) may disclose the odometer reading to the lessor on a [VSA-5](#) Odometer Disclosure Statement or a similar document. The lessor (owner of vehicle) shall transfer the odometer reading from the [VSA-5](#) or similar document to the assignment section of the title certificate. The [VSA-5](#) or similar document shall be attached to the title certificate.
- Licensed dealers should disclose the odometer reading on a secure document. However, if all reassignments of title are completed on the title or secure dealer reassignment form, licensed dealers may use a [VSA-5](#) or non-secure out of state odometer disclosure form to correct an odometer reading that was recorded incorrectly on an assignment of title transferring vehicle ownership.

Odometer Codes – The odometer reading that is captured during processing. When entered into the system, the odometer reading is followed by an odometer code (brand) reflecting the description of the odometer reading. These codes will also print as a “brand” on the actual title (example: 53269 E).

- Odometer readings must be recorded using only whole numbers (no tenths).
- Odometer readings and odometer codes are not required for non-powered vehicles (e.g.: trailers) because they do not have odometers.
- Odometer codes are listed below.

Odometer Code	Description
(A) Actual	The exact distance the vehicle has traveled (accrued mileage) as displayed on the odometer, whether in miles or kilometers.
(E) Exceeds the Mechanical Limits ^{1,2,3}	The odometer has reached the highest odometer reading mechanically available and has started numbering back at “0”. This refers to vehicles equipped with a 5 digit odometer that only displays a reading up to 99999. The mileage displayed on the odometer is recorded on the vehicle record with an indication that the reading exceeds the odometer's mechanical limits (i.e.: odometer displays 12000, however the cumulative mileage is 112000, so the odometer reading on the new title will display 12000 and “EXCEEDS” as the odometer brand).
(M) Optional – Moped ¹	ATVs, Low Speed Vehicles, Mopeds, Off – Road Motorcycles are not required to report an odometer reading. <ul style="list-style-type: none"> • Customers may choose to not record an odometer reading on the new title with the (M) odometer code branded on the title.
(N) Not Actual ^{1,2,3}	The exact distance the vehicle has traveled is unknown. The odometer reading that displays on the odometer does not reflect the actual mileage and should not be relied on. The title issued in the new customer’s name will show the (N) odometer brand.

Odometer Code	Description
(O) Exempt (Prior State) ¹	<<<<<REVISION Some states do not require odometer disclosures on titles for older vehicles. DMV will honor these exemptions. However, the exemption must be indicated on the new title. When printing the title document, "EXEMPT" will be printed in the odometer reading field and "PRIOR STATE" will be printed in the odometer brand field. Refer to Odometer Disclosure Exemption . END REVISION>>>>>
(T) Exempt (Virginia) Vehicles with a GVWR of more than 16,000 pounds ¹	This code applies to vehicles designed to carry cargo with TK (truck), VT (van truck) and TR (tractor) body types with a gross vehicle weight rating (GVWR) of more than 16,000 pounds.
(X) Prior to Federal Odometer Law ¹	The (X) odometer code is displayed in vehicles records in the system and printed on Virginia title certificates for vehicles that were titled prior to the federal Truth in Mileage Act Regulations although it is no longer used as an active odometer code.
¹ This brand is permanent and cannot be changed.	
² Recording an (E) Exceeds or (N) Not Actual odometer code on a vehicle lowers the value of that vehicle.	
³ For vehicles with a GVWR of more than 16000 pounds that have a prior odometer reading of (E) Exceeds or (N) Not Actual, the odometer code can be changed to (T) Exempt (Virginia).	

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DOCUMENTS USED TO DISCLOSE AN ODOMETER READING

The following documents may be used by the seller and the buyer to sign and print their names to disclose the odometer reading upon transfer of ownership of a motor vehicle.

- MCO/MSO – Manufacturer's Certificate of Origin/Manufacturer's Statement of Origin
- Conforming Title Certificate
- Non-Conforming Title Certificate (Must have a "DMV Odometer Disclosure Statement" VSA-5 attached)
- Secure Dealer Reassignment Form "Reassignment of Title by Virginia Motor Vehicle Dealer" ([VAD-20](#))
- Conforming (Secure) Power Of Attorney Form or (Secure) Dealer Reassignment Form used by an out-of-state dealer
- "Power of Attorney to Sign for Owner When Registering and/or Transferring Ownership of a Motor Vehicle" (VAD-70A)
- "DMV Odometer Disclosure Statement" ([VSA-5](#))/"Non-Secure Out of State Odometer Disclosure Form"

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<<<<<REVISION

ODOMETER DISCLOSURE EXEMPTION

Virginia law requires current odometer disclosure at the time of titling. Some other states do not require odometer disclosures for older vehicles. Virginia DMV will honor these other states' exemptions, but still record the odometer's reading. Out-of-state titles for vehicles 10 years old or older, with no odometer reading printed on the title, will be considered for exemption based upon the following determinations:

Customer presents the following title:	CSR Process:
<ul style="list-style-type: none"> • Odometer exemption printed on title 	<ul style="list-style-type: none"> • Capture current odometer reading for VA system • Mark odometer exempt • Place a Prior State brand on the title • Process the title
<ul style="list-style-type: none"> • Odometer exemption NOT printed on title 	<ul style="list-style-type: none"> • Capture current odometer reading for VA system • DO NOT mark odometer exempt • DO NOT place a Prior State brand on the title • Process the title

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END REVISION>>>>>

CUSTOMER REQUIREMENTS

1. Submit the odometer reading using one of the [documents used to disclose an odometer reading](#) listed above.
2. Sign in the appropriate section of the:
 - "Application for Certificate of Title and Registration" ([VSA-17A](#)) OR

- VA title certificate.

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FRONT COUNTER CSR

1. Review the Virginia or Out-of-State title for authenticity and to verify that the seller and the buyer have completed the transfer of ownership (assignment of title) and the seller has recorded the odometer reading at the time of the sale.
 - If the seller’s information is incomplete, inform the customer they must return to the seller to have them complete the assignment of title ensuring the seller records their printed name, signature, and the current odometer reading on the vehicle, date of sale and sales price.
2. Verify the odometer reading is completed in the “assignment of title” or on one of the other [documents used to disclose an odometer reading](#).
 - If the odometer reading is blank, advise the customer to return to the seller to complete the odometer reading.
IMPORTANT: The **seller** must complete the odometer reading on the assignment of title.
3. Process the title in the system. (Refer to [VLIC-3.000](#))
 - a. Use the following table to determine an acceptable odometer reading code for the new title.

Prior Odometer Reading Code	Acceptable New Odometer Reading Code
A	(A) Actual , (E) Exceeds Mechanical Limits, (N) Not Actual, (T) Exempt (Virginia Vehicles GVWR more than 16000 pounds)
E	(E) Exceeds Mechanical Limits, (T) Exempt (Virginia) Vehicles GVWR more than 16000 pounds
T	(T) Exempt (Virginia) Vehicles GVWR more than 16000 pounds** <ul style="list-style-type: none"> • When titling cargo vehicles that have a prior odometer reading of “EXEMPT” and do NOT have an odometer code (brand) recorded in the system, the CSR is not required to enter a new odometer reading. However, the CSR must enter a (T) Exempt (Virginia) odometer code (brand).
O	(O) Exempt (Prior State)**
N	(N) Not Actual, (T) Exempt (Virginia) Vehicles GVWR more than 16000 pounds
X	(X) Prior to Federal Law**
M	(M) Optional – Moped**
**This odometer code is permanent and cannot be changed.	

- b. Make sure the odometer reading and odometer code written in the “assignment of title” is the same as the odometer reading and odometer code entered into the system.
 - The system will not allow an odometer reading to be entered that is lower than the odometer reading recorded in the prior Virginia vehicle record or the odometer reading returned from NMVTIS. When this happens, an odometer discrepancy has occurred.
EXCEPTION: An odometer reading that is entered into the system with an Exceeds Mechanical Limits (E) odometer brand may be lower than the prior odometer reading because the “E” reflects an odometer reading that has exceeded 100000, 200000, or 300000 miles.
 - If the odometer reading recorded on the reassignment of title is equal to or higher than the prior Virginia vehicle record in the system or the odometer reading returned from NMVTIS, continue processing the title and proceed to step 4.
 - If the odometer reading recorded on the reassignment of title is LOWER than the odometer reading returned by the system (Virginia prior record or NMVTIS), use the guidelines listed for [Odometer Discrepancies – Front Counter CSR](#).
4. Collect the appropriate fees.
 5. Return any documentation presented that is not required for processing a title (e.g. marriage license, divorce decree, death certificate, and/or original power of attorney drafted by a law firm). These documents may be noted on the application but must be returned to the customer.
 6. Prepare transaction documents with correct barcode coversheet and place in appropriate area for document preparation.

ODOMETER DISCREPANCIES – FRONT COUNTER CSR

Use the following table to determine how to process a title to a motor vehicle in the new owner's name when an odometer system edit is received.

System Edit Received While Processing	Front Counter CSR Actions
Odometer reading is lower than prior odometer reading – Information was entered into the system incorrectly	<p>a. If a data entry error has occurred while processing the current title in the new owner's name:</p> <ul style="list-style-type: none"> • Correct the odometer reading error in the system • Ensure the odometer reading recorded on the assignment of title matches what is being entered into the system • Proceed to step 4 in the Front Counter CSR section. <p>b. If a data entry error has NOT occurred while processing the current title, ask the CSC Manager/Designee to review the paperwork.</p>
Odometer reading is lower than prior odometer reading – Odometer reading is recorded incorrectly on the assignment of title	<p>If the customer recorded the incorrect odometer reading in the assignment of title, advise the customer to:</p> <p>a. Go back to the seller to complete the next available assignment of title to transfer vehicle ownership and record the correct odometer reading at the time of the sale on the original paperwork.</p> <ul style="list-style-type: none"> • If all the reassignments on the title (Virginia or Out-of-State) are completely full and no more reassignments are available, the seller and purchaser may complete a DMV Odometer Disclosure Statement (VSA-5) to record the correct odometer reading. <ul style="list-style-type: none"> ○ Motor vehicle dealers licensed in Virginia should use a "Reassignment of Title" VAD-20, or a Secure Out-of-State Dealer Reassignment of Title. If the secure document is not available, they may use a DMV Odometer Disclosure Statement (VSA-5) to record the correct odometer reading. <p>b. Write VOID in the reassignment that contains the incorrect odometer reading. IMPORTANT: If the sale is from a licensed dealer, the dealership must provide a letter on the dealership letterhead with an explanation for the odometer correction and supporting documents.</p> <p>c. Return to DMV for processing.</p>
Odometer reading is lower than prior odometer reading – the customer requests an "Odometer Research" hold on the title record	<p>a. Ensure the customer completes an "Odometer Discrepancy Acknowledgement" (VSA-11) stating he understands and agrees to the following:</p> <ul style="list-style-type: none"> • The higher odometer reading recorded on the prior Virginia record or returned from NMVTIS will be recorded on his vehicle record with a "Not Actual" brand. • An "odometer research" hold is placed on his title record. A certificate of title will not be released for this vehicle until he provides additional documents supporting the odometer reading recorded on the assignment of title is correct and DMV Titling Work Center and/or DMV Law Enforcement Division reviews the documents, researches vehicle records, and determines either: <ul style="list-style-type: none"> ○ An error has been made, corrects the title record, and releases a certificate of title, OR ○ No error has occurred and/or there is not sufficient evidence to support changing the odometer reading. The higher odometer reading and "Not Actual" odometer branding will remain on the vehicle record. DMV releases a certificate of title with the higher odometer reading and the "Not Actual" odometer branding. • DMV's review process is final and may result in a higher odometer reading and a "Not Actual" odometer branding on his certificate of title. <p>IMPORTANT: Only the vehicle owner or authorized representative, who presents power of attorney, may complete the "Odometer Discrepancy Acknowledgement" (VSA-11).</p> <p>b. Give the customer the "Your Odometer: the Key to Your Car's Value" (DMV 280).</p> <p>c. Inform the customer he must provide DMV the supporting documentation which proves the odometer reading recorded on the assignment of title is correct to begin the review process.</p> <p>d. Ensure the customer understands he must allow DMV time to research the information provided.</p> <p>e. Proceed to step 4 in the Front Counter CSR section to continue processing the title.</p>

System Edit Received While Processing	Front Counter CSR Actions
Odometer reading is lower than the prior odometer reading – the customer requests to record the higher odometer reading on his certificate of title as “Not Actual”	<p>a. Ensure the customer completes an “Odometer Discrepancy Acknowledgement” (VSA-11) stating he understands and agrees to the following:</p> <ul style="list-style-type: none"> • The higher odometer reading recorded on the prior Virginia record or returned from NMVTIS will be recorded on his vehicle record with a “Not Actual” brand, which decreases the market value of the vehicle and possibly voids the vehicle warranty. • He will not pursue changes to the certificate’s odometer reading or branding. <p>IMPORTANT: Only the vehicle owner or authorized representative, who presents power of attorney, may complete the “Odometer Discrepancy Acknowledgement” (VSA-11).</p> <p>b. Give the customer the “Your Odometer: the Key to Your Car’s Value” (DMV 280).</p> <p>c. Proceed to step 4 in the Front Counter CSR section to continue processing the title.</p>

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PRIOR ODOMETER DISCREPANCIES - CSC MANAGER/DESIGNEE OR DMV SELECT EMPLOYEES

CSC Manager/Designee or DMV Select employees are authorized to correct a prior data entry error ONLY.

1. Inquire on the prior Virginia vehicle record in the system and images in ONBASE or microfilm, if available.
 - DMV Select offices must send a DL9 requesting an inquiry on prior Virginia vehicle images in ONBASE or microfilm.

NOTE: The CSC Manager/Designee or DMV Select cannot verify prior records for out-of-state vehicles. The customer must either return to the state in which the title was issued or he may request a title held be placed on his vehicle record so that he may provide supporting documents and request DMV to research and determine if there was a prior error.

2. Use the following table to determine the appropriate CSC Manager/Designee or DMV Select action when an odometer system edit is received:

Odometer Discrepancy	CSC Manager/Designee or DMV Select Actions
Data entry error HAS or HAS NOT occurred in the past	<p>Determine if a data entry error has occurred in the past.</p> <p>a. Compare the prior Virginia vehicle record and images in ONBASE or microfilm, if available, with the current paperwork.</p> <ul style="list-style-type: none"> • If it is determined a data entry error has occurred in the past: <ol style="list-style-type: none"> i. Update the prior vehicle record by entering the correct odometer reading and/or odometer brand code into the system using title maintenance. ii. Use the front counter scanner to scan the current title that has been assigned to the customer to the NMVTIS work center landing zone to notify them a correction has been made to the odometer reading and/or odometer code in the prior vehicle record. <ul style="list-style-type: none"> ○ Record “Corrected odometer reading due to DMV error on the prior Virginia title record” in the comments in ONBASE to explain why the correction was made in the system. <p>NOTE: DMV Select offices must fax the front and back sides of the current title that has been assigned to the customer to the NMVTIS work center.</p> <ul style="list-style-type: none"> ▪ Record “Corrected odometer reading due to DMV error on the prior Virginia title record” on the fax cover sheet. iii. Notify the CSR to continue processing the current title. • If it is determined a data entry error HAS NOT occurred in the past: <ol style="list-style-type: none"> i. Inform the customer a data entry error HAS NOT occurred in the past and offer the following options: <ul style="list-style-type: none"> ○ The customer may complete a VSA-11 to request a title held be placed on his vehicle record so that he may provide supporting documents and request DMV to research and determine if there was a prior error. OR ○ The customer may complete a VSA-11 accepting the higher prior odometer reading returned by the system with a “NOT ACTUAL” odometer code. ii. Notify the CSR to continue processing the current title based on the

Odometer Discrepancy	CSC Manager/Designee or DMV Select Actions
	customer's decision.
The customer is submitting an out-of-state title with a discrepancy	a. Advise the customer Virginia DMV cannot verify prior records for vehicles titled in another state and he has the following options: <ul style="list-style-type: none"> • Return to the state in which the title was issued to have the discrepancy corrected. OR • Complete a VSA-11 to request a title held be placed on his vehicle record so that he may provide supporting documents and request DMV to research and determine if there was a prior error. b. Notify the CSR to continue processing the current title in the customer's name or return the paperwork to the customer based on the customer's decision.
CSC management or DMV Select reviews paperwork and suspects the paperwork has been altered	<ul style="list-style-type: none"> • If fraud is suspected, refer to "Incident Reporting Guidelines" (LE-1.00). • If the paperwork is altered or questionable, <ul style="list-style-type: none"> ○ Complete a "Law Enforcement Action Report" (LE-019) in accordance with LE-1.00, and ○ Forward the LE-019, title and all supporting documentation to DMV Law Enforcement Division and secure all documents in the security closet according to LE-1.00. <p>IMPORTANT: If paperwork is sent for further review, the customer will not receive a title until the paperwork has been verified by Vehicle Services Administration or DMV Law Enforcement Division.</p>

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ODOMETER CORRECTIONS (Prior to Titling a Vehicle in Virginia)

When an odometer correction is requested BEFORE the title paperwork has been submitted to DMV, the buyer/seller for a casual sale or the licensed dealership may make corrections to the odometer disclosure information.

- The new Virginia title certificate should NOT be branded "NOT ACTUAL" unless the seller checked the "NOT ACTUAL" box or the previous title was branded as "NOT ACTUAL".

CUSTOMER REQUIREMENTS:

1. Write "VOID" in the assignment/reassignment section that contains the incorrect odometer reading.
 - Licensed dealers must also provide a letter written on dealership letterhead with an explanation for the odometer correction.
2. Complete the next open reassignment on the title certificate, "Reassignment of Title" ([VAD-20](#)), or secure out-of-state reassignment of title to disclose the correct odometer reading.
3. Submit the documents to DMV to process the title in the new owner's name.

FRONT COUNTER CSR REQUIREMENTS:

1. Verify the following is included with the paperwork:
 - a. "VOID" is written in the assignment/reassignment section that contains the incorrect odometer reading.
 - b. The next open reassignment of title on the title certificate, "Reassignment of Title" ([VAD-20](#)), or secure out-of-state reassignment of title is completed.
 - c. Letter from the licensed dealer is provided on dealership letterhead explaining the odometer correction, if applicable.
2. Process the title in the new customer's name using the correct odometer reading. (Refer to the [Front Counter CSR](#) section)

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ODOMETER CORRECTIONS (After Titling a Vehicle in Virginia)

When an odometer correction is requested AFTER the title paperwork for either a casual sale or a dealer sale has been submitted to DMV and a VA title certificate has been established, the buyer/seller for a casual sale or the licensed dealership may make corrections to the odometer disclosure information. The new Virginia title certificate will be branded "NOT ACTUAL" unless the incorrect reading was due to a DMV error at the time of titling when the incorrect odometer reading was keyed into the system.

CUSTOMER REQUIREMENTS:

1. Submit title that was processed with the incorrect odometer reading.
 - If a dealer error was made, the dealer must provide a letter, on the dealership letterhead, explaining the odometer correction and provide supporting documents.
 - If a customer error was made on a casual sale between individuals, the customer must complete a new assignment of the title on the current Virginia title recording the correct odometer reading. The assignment of title must contain BOTH the signature and printed names of BOTH the buyer and seller to disclose the odometer reading.

- If the customer (buyer) is unable to locate the previous owner (seller) to obtain a signature and printed name to disclose the correct odometer reading, the odometer reading will remain as currently indicated on the title record.
 - If the customer states a DMV error was made, the customer (an individual or a dealer) must provide supporting document(s) to DMV supporting the correct odometer reading.
2. Pay the substitute title fee, if applicable.

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FRONT COUNTER CSR REQUIREMENTS:

1. Compare the supporting documents and the title submitted for odometer correction. If the sale is from a licensed dealer, the dealership must also provide a letter on the dealership letterhead with an explanation for the request for the odometer correction.
 - a. If the documents support correcting the error, update the vehicle record by entering the correct odometer reading and/or code into the system using title maintenance.

IMPORTANT: The system will not allow an odometer reading to be recorded that is lower than the odometer reading recorded in the prior Virginia vehicle record or the odometer reading returned from NMVTIS.

 - i. If the odometer reading recorded on the reassignment of title or supporting documents is equal to or higher than the prior Virginia vehicle record in the system or the odometer reading returned from NMVTIS, continue processing the correction and proceed to step 2.
 - ii. If the odometer reading recorded on the reassignment of title or supporting documents is lower than the odometer reading recorded in the prior Virginia record or the reading returned from NMVTIS or the customer states the error is a DMV processing error, ask CSC management to review the paperwork and the customer's request.
 - b. If the documents are questionable, ask CSC management to review the paperwork.
2. Process a substitute title.
3. Collect the substitute title fee, if applicable.
 - DMV errors must be corrected and processed at NO FEE.
4. Give the customer the title with the corrected odometer reading.
5. Place all documents in the appropriate area for document preparation.
 - Give the title that was submitted for the correction to the CSC Manager/Designee informing them an odometer correction has been made on the vehicle record so they may send the title to the [NMVTIS work center](#).

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CSC MANAGER/DESIGNEE OR DMV SELECT REQUIREMENTS:

1. Compare the vehicle record, all supporting documents, and images in OnBase or microfilm (if available) to verify the supporting documents uphold making an odometer correction.
 - a. If the documents support correcting the error:
 - i. Update the vehicle record by entering the correct odometer reading and/or code into the system using title maintenance.
 - ii. Scan the current title on the front counter scanner sending it to the [NMVTIS work center](#) landing zone to notify them a correction has been made to the odometer reading and/or odometer code in the vehicle record.
 - Write "Corrected odometer reading due to DMV error when processing the Virginia title" in the comments in ONBASE to explain why the correction was made in the system.
 - DMV Select offices must fax the front and back sides of the current title to the NMVTIS work center.
 - Write "Corrected odometer reading due to DMV error when processing the Virginia title" on the fax cover sheet.
 - iii. Return the paperwork to the CSR.
 - b. If the paperwork DOES NOT support correcting the error, use the following guidelines to determine where to send the paperwork for further review:
 - i. If fraud is suspected, refer to "Incident Reports guidelines" ([LE-1.00](#)).
 - ii. If the paperwork is altered or questionable,
 - Complete a "Law Enforcement Action Report" ([LE-019](#)) in accordance with [LE-1.00](#), and
 - Forward the LE-019, title and all supporting documentation to DMV Law Enforcement Division.
 - iii. Forward all other identified odometer reading discrepancies to DMV Vehicles Services Administration.

- iv. Inform the customer the paperwork is being sent for further review AND he will not receive his title until the paperwork has been verified by the DMV Vehicle Services Administration or DMV Law Enforcement Division.
2. Advise the CSR to process the substitute title.

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DMV CUSTOMER CONTACT CENTER ACTIONS

- When receiving customer calls about recording the odometer reading on a sale of vehicle or reassignment of title, advise the customer they must record the odometer reading as it displays on the odometer on the vehicle.
- When customers inquire about making odometer corrections to their vehicle title and records or removing an odometer research held from their vehicle record, advise them they must provide DMV with documentation supporting their request.
 - Supporting documents may include, but are not restricted to:
 - Vehicle inspection receipts that contain odometer readings,
 - Repair bills from mechanics that contain mileage at the time repairs were made, or
 - Receipts from routine oil changes that contain mileage at the time of the oil change.
- Inform customers supporting documentation must be approved and may be forwarded to the Vehicle Services Administration for further review and approval to complete the customer's request to correct the odometer reading.

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POINTS TO REMEMBER

- The new Virginia title certificate should ONLY be branded NOT ACTUAL when:
 - The seller checked the "NOT ACTUAL" box or the previous title was branded as "NOT ACTUAL".
 - The customer completes an "Odometer Discrepancy Acknowledgement" ([VSA-11](#)) when titling a vehicle in their name and one of the following statements applies:
 - The customer chooses to record the higher odometer reading as "NOT ACTUAL" odometer reading and take their title today understanding they may not challenge the "NOT ACTUAL" branding at anytime in the future.
 - The customer states the vehicle's odometer is broken or not functional and the odometer reading cannot be determined.

NOTE: This statement applies ONLY to vehicles that have a prior odometer code (brand) of (A) Actual.

 - If the PRIOR odometer code (brand) is (E) Exceeds Mechanical Limits, (T) Exempt (Virginia) Vehicles GVWR more than 16000 pounds, or (O) Exempt (Prior State), it cannot be changed to (N) NOT ACTUAL, refer to the table in the Front Counter CSR section to determine an [acceptable new odometer code \(brand\)](#).
 - The customer requests an odometer research hold to be placed on their title record until they provide supporting documentation to DMV and allow DMV to research and determine if the mileage can be changed.
 - DMV completed the odometer research and determined the supporting documentation is not sufficient to change the odometer reading and/or brand and the mileage will remain the higher mileage as recorded in the system with a NOT ACTUAL odometer code brand.
 - If a system edit is received while processing a title to a vehicle and the customer states the odometer reading he is reporting is correct, he MAY request to title the vehicle in his name placing an odometer research held on the title record until the research to determine and confirm if an error has occurred is completed by DMV Vehicle Services or DMV Law Enforcement Division. They will not begin to research until the customer submits the supporting documentation.
 - **All "Odometer Research" holds on vehicle title certificates MUST be removed by [DMV Vehicle Services Administration](#) or [DMV Law Enforcement Division](#).**
 - When a customer submits documentation to remove an odometer research held from the vehicle record which supports the lower odometer reading recorded on the original paperwork completed at the time of titling the vehicle, CSRs must forward all documents received to DMV Vehicle Services Administration [Titling Work Center](#) via the landing zone, refer to [VLIC-3.575](#).
 - DMV Select offices must mail all supporting documents to VSA/[Titling Work Center](#) for review.
- EXCEPTION:** CSCs and DMV Selects are authorized to remove the "odometer research" held ONLY if the customer completes the "Odometer Discrepancy Acknowledgement" ([VSA-11](#)) and states the following:
- He does not want to wait for research to be completed or he does not have any supporting documents and would like to receive his title today.
 - He accepts the "Not Actual" brand on his title.
 - He will not pursue further changes to the certificate's odometer branding.

IMPORTANT: Only the vehicle owner or authorized representative, who presents power of attorney, may complete the "Odometer Discrepancy Acknowledgement" ([VSA-11](#)).

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CONTACT

For additional information contact:

- Your CSC Manager/Assistant Manager
- DMV Customer Contact Center Help Desk at (804) 367-6646
- VSA/[Titling Work Center](#)