

## Vehicle Licensing Guide

### Insufficient Documents for Titling-Title Held VLIC-3.575

**Original Date:** 08/01/1977

**Revision Date:** 09/10/2016

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POLICY	
<b>Title:</b> Insufficient Documents for Titling-Title Held	
<b>Effective Date:</b> August 1, 1977	<b>Revision Date:</b> August 25, 2014
<b>Authority:</b> N/A	
<b>Policy:</b> When certain requirements or conditions for titling a motor vehicle are not met at time of application (e.g. missing documents, information, research or investigation, etc.), DMV may process the title pending submission and/or satisfaction of all requirement(s) by placing an authorized title HELD code on the record to stop the title from printing.	
<b>Exception:</b> Vehicle records may not be held in the following situations: <ul style="list-style-type: none"><li>• A current, valid registration card is presented as proof of ownership and the model year of the vehicle is prior to the year that the state of registration began issuing titles,</li><li>• The current vehicle record is titled in Virginia with an electronic lien "held" on the current record.</li><li>• Vehicle identification number (VIN) is incomplete or incorrect.</li><li>• Odometer reading is missing from the application.</li><li>• Additional information is needed through the use of any VSA form (i.e. <a href="#">VSA 17A</a>).</li><li>• Miscellaneous inconsistencies (Example: the date on the title does not agree with the last title date on the DMV computer system, low vehicle sales price, etc.).</li></ul>	
<b>REVISION</b> A HELD (CUST Held) may be placed on a vehicle record at the request of the vehicle owner at time of titling to allow DMV to maintain an electronic title record and stop the title from printing. A CUST Held is voluntary, and may be released and the title printed at any time by the vehicle owner, provided no additional stops exist and all liens are satisfied. Process requests for a CUST Held in accordance with <a href="#">VLIC-3.430</a> . <b>END REVISION</b>	

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### CUSTOMER REQUIREMENTS-PROCESSING TITLE WITH HELD

1. Submit completed Application for Certificate of Title and Registration ([VSA 17A](#)) or Application for Certificate of Title-Manufactured Home ([VSA 17B](#)) for one of the following conditions:
    - Dealership applies for a certificate of title with inadequate or missing supporting documentation (proof of ownership such as the vehicle title, missing signatures, etc.).
    - The system returns an odometer reading that is higher than the odometer reading recorded on the submitted paperwork AND the customer requests an "Odometer Research" HELD (process in accordance with [VLIC-3.520](#)).
- REVISION**
- A Motor Carrier conducting business as an Owner/Operator in which the vehicle owner lives out of state, but the vehicle operator is registering the vehicle in Virginia for IRP registration purposes. **END REVISION**

- Application for title is received with other title HELD indicators.
- 2. Submit proof of address (if applicable).
- 3. Copy of the bill of sale or buyer's order from dealership.  
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  - **EXCEPTION:** Applicants registering a vehicle for IRP registration purposes in an Owner/Operator operation are not required to submit a bill of sale.
- 4. For applicants registering a vehicle for IRP registration purposes in an Owner/Operator operation, present the following:
  - Photocopy of the out of state title or registration card.
  - Copy of the vehicle owner's driver license (faxed, mailed or scanned document is acceptable). **END REVISION>>>>>**

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#### FRONT COUNTER CSR-PROCESSING TITLE WITH HELD

1. Verify completion of the [VSA 17A](#) or [VSA 17B](#).
2. Review the ownership documents for authenticity (refer to the Authenticity Manual / Fraudulent Document Manual) and verify that all forms are completed and signed as required.
3. Determine what additional documentation, information, or research and/or investigation, is required, or what condition(s) must be satisfied to allow the title to process (e.g. form completion, ownership documents, title authentication, odometer/body type research and investigation, etc.).
4. Check the column titled "Item Needed or Problem to Correct" in the list of [Authorized Title Held Condition Codes](#) to determine if there is a title HELD code that matches the description of the title scenario being processed.
  - a) For title transactions with an authorized title HELD code, key the appropriate title HELD code to allow the title to process.
    - For title transactions submitted by motor vehicle dealers with inadequate or missing supporting documentation (e.g. proof of ownership such as the vehicle title, missing signatures, etc.):  
**NOTE:** For dealer transaction the vehicle ownership document will usually be a Bill of Sale (BOS).
      - i. Enter two HELD codes when there is both insufficient evidence of ownership and the out-of-state title is not available; a dealer HELD code is used for the insufficient evidence and a HELD code identifying the state from which a title is required (e.g. "DLR" and "AL").
      - ii. Enter the title HELD code "DUAL" to indicate Evidence of Ownership Needed if the dealer does not know the state where the vehicle was last titled.
      - iii. Issue the system-generated Request for Additional Evidence of Ownership form (VSA 64) to the dealer and advise what information and documents are needed.
      - iv. Inform the dealer that the title will not be released until the required evidence of ownership, and/or other documents are submitted to DMV.
        - Submission of the required evidence of ownership (or other required documentation) is the dealer's responsibility and not the purchaser's.
    - When an odometer reading is returned by the system that is higher than the odometer reading recorded on the submitted paperwork AND the customer requests an "Odometer Research" HELD, process in accordance with [VLIC-3.520](#).
      - Give the customer the "Your Odometer: the Key to Your Car's Value" ([DMV 280](#)).
      - DO NOT title and register vehicles using a title HELD for which no odometer disclosure is reported on the titling documents. Return the paperwork and advise the customer an odometer reading is required.
      - For suspected odometer fraud, or for altered or questionable odometer readings (erasure marks, print is typed versus computer printed, etc.), refer to processing guidelines in [VLIC-3.520](#).

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- For applicants registering a vehicle for IRP registration purposes in an Owner/Operator operation, enter the IRP held code. **END REVISION>>>>**
  - Other conditions when submission of additional documentation, information, or an investigation is required to allow for processing provided an authorized title HELD condition code exists.
- b) For title transactions NOT authorized for processing with a title HELD (see table below), DO NOT PROCESS TITLE. Follow the guidelines below:
- i. Return all transaction documents to the customer,
  - ii. Advise the customer of what additional documents are required,
  - iii. Provide the customer with a Customer Return Form documenting the requirements.

Title Transactions Not Authorized for Processing Using a Title HELD Code	
• Customer's only proof of ownership is an out-of-state registration card that is current or expired for less than one year, with or without a bill of sale, and the model year is prior to the year titles were issued in that state (refer to <a href="#">VLIC-3.555</a> )	
• Current vehicle title has an electronic lien (lien) "HELD" on record (refer to <a href="#">VLIC-3.615</a> ). Lien must be released to title	
• Vehicle identification Number on the application is incomplete or incorrect (refer to <a href="#">VLIC-3.455</a> )	
• Odometer reading is missing from the application (refer to <a href="#">VLIC-3.520</a> )	
• Additional information is needed for any VSA form: <ul style="list-style-type: none"> <li>▫ Dealer Reassignments, <a href="#">VSA 17A</a>, <a href="#">VSA 17B</a>, Affidavit in Lieu of Title-<a href="#">VSA 12</a>, or other required forms</li> </ul>	
• Miscellaneous titling inconsistencies for which no title HELD authorization code exists, for instance: <ul style="list-style-type: none"> <li>▫ Inconsistent title dates (refer to <a href="#">VLIC-3.120</a>)</li> <li>▫ Reported sales price is lower than NADA Trade-In Value (<a href="#">VLIC-4.625</a>)</li> </ul>	

5. Continue processing the transaction.
  6. Collect the appropriate fee(s).
    - Sales and use tax,
    - Titling fee
    - Registration fee (if applicable)
  7. Issue registration and multi-use or metal plates (if applicable).
  8. Write or stamp the issued license plate number on the system-generated Request for Additional Evidence of Ownership print-out (VSA 64) before giving to the dealer (when applicable).
  9. Verify that title HELD condition printed on owner's registration card; then give the owner's registration card to the customer or dealer.
  10. Inform the customer or dealer that the title will not be released until the appropriate document(s) is submitted to DMV or until the title HELD reason has been satisfied.
- <<<<<REVISION**
11. For IRP registration purposes, the system will not allow the change or removal of HELD. **END REVISION>>>>>**
  12. Complete the title Held portion of the [VSA 17A](#) or [VSA 17B](#) by writing the title held reason in the title held field.
  13. Prepare the documents with the correct barcode coversheet and place in the appropriate area for document preparation.

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## CUSTOMER REQUIREMENTS-RELEASING TITLE HELD

1. Submit to a CSC, or by mail to the address below, proof of compliance with all titling requirements (e.g. documentation, information, research/investigation, etc.) required for the release of the title HELD.

**Virginia DMV  
Attn: Titling Work Center  
PO Box 27412  
Richmond, VA 23269**

**NOTE:** Encourage customers choosing to send titling documents by the United States Postal Service (USPS) to send via certified mail to help ensure safe delivery. DMV cannot assume responsibility for lost mail.

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2. For a vehicle titled for IRP registration purposes in an Owner/Operator operation, the system will not allow the release of the IRP held. In order to obtain the Virginia title document, the vehicle will need to be retitled. **END REVISION>>>>**

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## FRONT COUNTER CSR-RELEASING TITLE HELD

1. Verify proof of compliance by the customer with all title HELD requirements to allow for release of the title HELD.  
**NOTE:** Unless specifically indicated otherwise, no application is required to release a title HELD in the system once the CSR verifies the customer has complied with all title HELD requirements.
  - For customers submitting supporting documentation for an Odometer Research HELD to a CSC, scan all documents via ONBASE landing zone to DMV [Vehicle Services Administration](#) (VSA) for review and research in accordance with [VLIC-3.520](#):
    - i. In ONBASE select "Remove Odometer Research Held" as your subject
    - ii. Ensure the following customer contact and vehicle information is included with the documents:
      - Customer name, telephone number and/or email address
      - Title number AND last 4 digits of the vehicle identification number
    - iii. Scan the documents

**IMPORTANT:** All "Odometer Research" HELDs placed on vehicle records MUST be removed by DMV [Vehicle Services Administration](#) or [Law Enforcement](#) ONLY.

**EXCEPTION:** CSCs and DMV Selects are authorized to remove an "Odometer Research" title HELD ONLY when the customer decides he wants the title BEFORE the research for an Odometer Research HELD is completed in accordance with [VLIC-3.520](#).
  - The customer must acknowledge his acceptance of a "Not Actual" brand on the title and agree he will not pursue further changes to the certificate's odometer branding by completing the "Odometer Discrepancy Acknowledgement" ([VSA 11](#)).
2. Release the title HELD in the system.
3. Provide the title to the customer.
4. Prepare the title HELD compliance documents with the title HELD barcode coversheet and place in the appropriate area for document preparation.

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## POINTS TO REMEMBER

- Most common title HELD conditions placed on vehicle records are:
  - State, Providence or Out of Country hold: This stop requires the customer to present a proper ownership (e.g. Title) document in order to obtain a Virginia title.
    - This is a common held if the customer moves into Virginia from out-of-state and a lien is on the vehicle.
  - MCO, MSO: Dealership or Customer must submit a properly assigned Manufacturer's Certificate of Origin or Manufacturers Statement of Origin
  - NCIC: If NCIC is not functioning, a held will be placed on the vehicle record until the VIN can be cleared.
  - ELIEN: E-Lienholder must remove lien electronically (a paper lien release is not acceptable.)

**IMPORTANT:** Once the E-Lien Print Held is released without release of the lien, the lien is treated as a standard lien (not an e-lien). Once the lienholder signs off the printed title, the title or lien release document can be submitted to any CSC to have the lien released in the system (refer to [VLIC-3.615](#)).
  - CUST: Customer elects to have DMV electronically store their title and may be released at the customer's request. Process in accordance with [VLIC-3.430](#).
  - DLR: Dealers are required to title vehicles and pay the required SUT within 30 days of the sale even if unable to provide all documentation (such as the ownership document). CSCs process these titles by placing a DLR Held on the record to stop the title from printing. The system generates the VSA 64 as a guide for what documents must be submitted to allow for release of the Held and title print.
  - ODOMETER RESEARCH HELD: The customer chooses to process the title with the "odometer research" held on his title certificate so that he may provide DMV with supporting documentation proves

the odometer reading recorded on the assignment of title is correct and allow DMV time to research the information provided (refer to [VLIC-3.520](#)).

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- Motor Carrier Owner/Operator for IRP registration purposes.
  - Vehicles titled with the IRP held will not be issued a Virginia title document, nor will the title data be sent to the National Motor Vehicle Title Information System (NMVTIS).
  - A system edit will not allow the IRP held to be changed or removed.
  - In order to obtain a Virginia title, the vehicle must be retitled. **END REVISION>>>>>**
- Customers may apply to release a title HELD by submitting required documents and/or information to any CSC or by mailing it to the Titling Work Center in HQ
- If a dealer title HELD condition remains on record after 60 days, CSS will generate a letter to the dealer, lienholder and customer reminding them to provide the evidence of ownership in order to release the Virginia title (See [RELATED LINKS](#) below).

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- If the dealer does not respond to the 60 day letter within 30 days, a second reminder letter is generated and mailed to the dealer, lienholder and customer. A copy of this letter is also delivered to the Online Vehicle Programs work center for further action as needed. **END REVISION>>>>>**

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## DMV CONTACT CENTER ACTIONS

- For a detailed list of current held indicators, consult [Title HELD Condition Codes](#).
- For Odometer Research HELD supporting documents submitted to a DMV Select they must be mailed to DMV Titling Work Center in HQ.
- Continue your diligence in not promising acceptability of documents to customer:
  - Do NOT use phrases like:
    - "You have everything you need, just go to a CSC and they will issue your document."
  - Use phrasing such as:
    - "The document(s) you have listed may be acceptable: You will need to take the documents to the CSC and have them verified. The CSC will make the final determination of your eligibility to receive your title/registration card."

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## RELATED LINKS

[Title HELD Condition Codes](#)

[60 Day Held Title Letter Sent to the Dealer](#)—Sample #1

[60 Day Held Title Letter Addressed to Customer](#)—Sample #2

[60 Day Held Title Letter Sent to Lienholder](#)—Sample #3

[90 Day Held Title Letter Sent to the Lienholder](#)—Sample #4

[90 Day Held Title Letter Sent to the Dealer](#)—Sample #5

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## CONTACT

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For additional information contact:

- Your CSC Manager/Assistant Manager
- DMV Contact Center Help Desk at (804) 367-6646
- VSA/[Titling Work Center](#)
- [Motor Carrier Services](#) **END REVISION>>>>>**