



August 21, 2014

Registration and Title Bulletin # 017-14

Registration and Title System

TO: All County Tax Assessor-Collectors and Motor Vehicle Dealers

SUBJECT: **Capture of Federal Employer Identification Number/Employer Identification Number (FEIN/EIN)**

PURPOSE

To provide you with guidance regarding the capture of the FEIN/EIN in lieu of an employee's or authorized agent's personal identification information when a title application is filed in the name of an entity.

DETAILS

With the Registration and Title System (RTS) 7.5.0 Release, scheduled for September 22, 2014, you will be able to capture an entity's FEIN/EIN by selecting "FEIN" in the "Id Type:" dropdown box on the Owner Entry TTL007 screen.

The identification requirements of the individual submitting the transaction on behalf of the entity have not changed. An employee or authorized agent must still provide acceptable identification as outlined in RTB #013-14. However, the individual may provide the FEIN/EIN for the entity, which can be captured in RTS in lieu of the individual's personal identification information.

In order to capture the FEIN/EIN in RTS, a document associating the FEIN/EIN to the entity appearing on the title application must be shown at the time of application. This documentation will be treated in the same manner as personal identification. The documentation does not have to be submitted to the county tax assessor-collector for dealer transactions, but a copy must be retained with the dealer's sales records. When the transaction does not involve a dealer, a county tax assessor-collector is not required to retain a copy or submit it with the transaction to the department. As with personal identification information, it must only be visually verified and entered into RTS.

Motor vehicle dealers using Dealer Title Application (DTA) software will be unable to capture the FEIN/EIN until software programming changes can be implemented. The next DTA software update will be available with the RTS 7.6.0 Release scheduled for early 2015. Until programming changes are implemented, DTA transactions involving an entity will be required to continue capturing the employee's or authorized agent's personal identification information or these transactions will have to be submitted to the county tax assessor-collector for processing in order to record the FEIN/EIN. However, dealers utilizing webDEALER will be able to capture the FEIN/EIN.

Examples of acceptable documents to verify the associating FEIN/EIN to the entity appearing on the title application could include a business tax filing or documents from the Comptroller of

Public Accounts, Secretary of State, or Internal Revenue Service (IRS). These examples are not all encompassing nor is there a specified list of acceptable documents.

The *Application for Texas Title, Form 130-U*, will be revised to allow for the recording of the FEIN/EIN. Until the revised **Form 130-U** is available, the FEIN/EIN can be recorded in Box 14a in the "Photo ID Number" field by writing "*FEIN/EIN*" and recording the number.

COUNTY ACTION

With the release of RTS 7.5.0, you may capture either an entity's FEIN/EIN or the employee's or authorized agent's personal identification information. Although the FEIN/EIN is not required, either the employee's or authorized agent's personal identification information or the FEIN/EIN must be captured. When the FEIN/EIN is not available, continue to capture the employee's or authorized agent's personal identification information in RTS.

When an entity submits a title application recording a FEIN/EIN, review the documentation that associates the FEIN/EIN to the entity appearing on the title application. This can include a tax filing or documents from the Comptroller of Public Accounts, Secretary of State, or IRS.

Please ensure the FEIN/EIN is recorded on the *Application for Texas Title, Form 130-U*.

CONTACT

If you have any questions, please contact your local TxDMV Regional Service Center.

Sincerely,

A handwritten signature in blue ink that reads "Tim Thompson". The signature is written in a cursive, flowing style.

Tim Thompson, Deputy Director
Vehicle Titles and Registration Division

Attachments