



Temporary Limited Use Electronic Signatures for Certificates of Title and Certificates of Origin (MCOs) – Effective 1/1/2026

Introduction

Effective January 1, 2026, the RMV is implementing temporary guidelines that allow dealerships to use Electronic Signatures (eSignatures) on Certificates of Title (Title) and Manufacturer's Certificates of Origin (MCO) when they submit documents through the Electronic Vehicle Registration (EVR) program. This policy is designed to improve efficiency in the vehicle titling process and ensure compliance with [M.G.L. c. 110G](#) (the Massachusetts Uniform Electronic Transactions Act), the Massachusetts Department of Transportation (MassDOT) Electronic Signature Policy, and the E-Signature requirements set forth in Sections 40 and 135 of [Chapter 9 of the Acts of 2025](#).

Once secure documents like vehicle titles and MCOs are electronically signed, the primary security control shifts from physical document features (lost in scanning) to digital signature authentication. The RMV requires digital signatures to be executed on NIST Level 2-compliant signature platforms for more secure fraud protection and consumer protection. This references [NIST Special Publication 800-63, Revision 3 \(or higher\) - Digital Identity Guidelines](#). The RMV recognizes that it will take time for dealers to configure readily available platforms and develop the comprehensive identity proofing and authentication workflows and business processes required for NIST Level 2 compliance.

The temporary Limited Use process effective 1/1/2026 meets the RMV's compliance directive and allows dealerships to use readily available digital signature platforms and largely manual methods of identity and authenticator assurance that approximately, but do not fully meet NIST level 2 standards.

This Limited Use Policy replaces all previous guidance, procedures, or policies regarding the acceptance of Electronic Signatures on Paper Titles and MCOs. The temporary Limited Use policy will remain in place for the earlier of 12 months (until 1/1/2027) or until eligible dealerships implement service-based, NIST Level 2-compliant digital signature platforms.

Who can use the Limited Use Process

Dealers may use Electronic Signatures on Titles or MCOs when all of the following conditions are met:

- The dealership is a Class 1 or Class 2 dealer enrolled and actively participating in EVR.
- The dealership has legal ownership of the vehicle, meaning:
 - They have taken ownership themselves, or
 - They have been assigned the Title or MCO by the previous owner, another dealer, or the manufacturer.
- Titles may come from any state
- The vehicle—new or used—is being sold to a retail customer (individual or business).
- The dealer has the physical Title or MCO in hand, along with all required supporting documents (e.g., odometer disclosure forms, dealer reassignment forms).
- The Title has no outstanding liens or encumbrances.

- Both the dealer and the customer voluntarily agree to use Electronic Signatures. The dealer may not require the customer to sign electronically.

Limited Use Process Guidelines

Dealerships must implement the following:

Service-based Digital Signature Platform

Dealerships must use a cloud-based professional digital signature service (such as DocuSign, Adobe Sign, or similar platform—many available at low monthly costs) accessed independently or through its Dealer Management System (DMS) or EVR Service Provider. The platform must, at a minimum, include:

- Packet creation: Ability to generate a single combined PDF containing the scanned Title or MCO, the required RMV fillable form - the “[Digital Signature Retail Sale Assignment](#)” for Titles or the “[Electronic Certificate of Origin](#)” for MCOs - and any additional documents.
- Multi-party workflow: A signing sequence that supports defined order (e.g., Dealer first, then customer).
- Secure delivery: Ability to send documents through a time-limited, secure HTTPS link.
- Tamper-evident final document: Once all signatures are applied, the platform must produce a final PDF that invalidates signatures if any changes are made.
- Certificate of Completion containing:
 - Document Name/ID
 - Each signer’s full legal name and verified email address
 - A complete audit trail, including time-stamped signature events and authentication methods used
 - Verification that the document has not been altered

Built-in PDF readers, free annotation tools, or basic e-signature features in office software are **NOT** acceptable.

Requirements for Authorized Dealer Representatives

- The Digital Signature platform must capture the name and work email address of the authorized Dealer representative in the official audit trail.
- The Dealer must maintain internal records showing that any Dealer representative whose signature appears:
 - Has been explicitly authorized by the Dealer to sign Titles and RMV Title-related forms, and
 - Has had their identity verified by inspecting a valid government-issued photo ID at or before the time authorization was granted.
- Retain the records per [EVR Document Retention Policy](#) and make available to RMV upon request
- Internal controls must ensure each authorized signer uses a unique, non-shared E-Signature account (e.g., an individual work email). Shared accounts or shared credentials are prohibited.

Requirements for Customer Identity Authentication

For each customer whose signature is required:

- Obtain and review a front and back color image of the customer's government-issued photo ID (e.g., driver's license)
 - Require the customer to submit a photograph of themselves holding the same ID next to their face with the photo side visible to camera.

NOTE: The best practice is to utilize a secure method for transmitting any personal information to/from customers electronically, be secure file upload, secure email, etc. This is to protect the customer from having their information compromised. Retain the images and when they were captured per [**EVR Document Retention Policy**](#) and make available to RMV upon request.

- Validate the driver's license using the [**American Association of Motor Vehicle Administrators' \(AAMVA\) Driver's License Data Verification \(DLDV\) Service**](#), if available.

NOTE: If DLDV available, retain the DLDV response/result per [**EVR Document Retention Policy**](#) and make available to RMV upon request

- Validate the customer's email address by sending a random code to the email provided and requiring the customer to return that code through a different communication channel (e.g., phone call or text message).
- For business purchasers, the representative from the business must obtain written authorization from the business proving signer has authority to purchase on behalf of the company.

NOTE: The written authorization must be retained per [**EVR Document Retention Policy**](#) and made available to the RMV upon request.

Transaction Workflow

Dealers must complete all the following steps to execute an E-Signature on a Title or MCO and include with the transaction.

Document Preparation

To prepare documents:

- Scan the front and back of the Title or MCO and any required additional documents (e.g., odometer disclosures, Dealer reassignment forms).
- Upload the scanned documents and combine them with the required RMV fillable form ("Digital Signature Retail Sale Assignment" or "Electronic Certificate of Origin") into one integrated packet

Dealer Signature

- Dealer authorized representative accesses platform
- Complete and apply Digital Signature to the "Digital Signature Retail Sale Assignment" or "Electronic Certificate of Origin" form.

Customer Signature

- Customer completes identity authentication
- To securely route E-Signatures:
 - Route the proof of ownership packet through the Digital Signature platform to customer email addresses.

- Customers must be granted access through a secure link that expires in 24 hours.
- Customer reviews and digitally signs the form

Distribution and Submission

- After all E-Signatures are collected, the Digital Signature platform must send the completed packet to all signatories
- The Dealer must download the Certificate of Completion from the Digital Signature platform
- The packet and the certificate of completion are separate files to be kept in the same folder that IEP has access to
- **EVR Processing** - The following requirements apply to transactions:
 - The Dealer must submit the signed packet and Certificate of Completion electronically with intact metadata as part of the EVR transaction, along with all required transaction-supporting documents.
 - The Dealer must upload the signed packet as-is without modification and use existing tag of "Proof of ownership title"/" Certificate of origin" as appropriate
 - The Dealer must upload the Certificate of Completion as a supplemental form and tagged as "Proof of Digital Signature."
 - If the EVR transaction fails/errors:
 - The RMV may accept a hard-copy submission at a Service Center as part of the B2B drop off process. The submission must include, along with other required documents:
 - Printed final e-Signed packet
 - Printed Certificate of Completion
 - Printed error message from the EVR Service Provider
 - At the Service Center, the Customer Service Representative (CSR) will apply the proper tag (Document Type) for Certificate of Completion as "Proof of Digital Signature" when scanning. The printed signed packet will be tagged as "certificate of title"/" Certificate of origin" as applicable.
 - Note that this paper backup process is an **EXCEPTION** and must only be used as such. Electronic submission remains the standard requirement.

Post-Transaction Processing

- The Dealer must invalidate the reassignment area on the back of the Title or MCO and any related documents by stamping "Title assignment has been digitally signed" in place of the assignment section used for the sale.
- The Dealer must retain the signed packet and Certificate of Completion for at least five (5) years:
 - In an electronic format that cannot be altered without authorization from the RMV
 - Stored so that documents can be retrieved systematically upon request of the RMV

Training Materials and Documentation

Detailed EVR processing instructions can be found in the applicable Job Aids and related documentation published on the [**Electronic Vehicle Registration \(EVR\) Program Documents**](#) page.

References

- [Electronic Vehicle Registration \(EVR\) Program](#)
- [Electronic Vehicle Registration \(EVR\) Program Documents](#)
- [Digital Signature Retail Sale Assignment](#)
- [Manufacturer's Certificate of Origin \(MCO\)](#)
- [EVR Limited Use Electronic Signature Policy Job Aid](#)